

Safeguarding and Child Protection Policy

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Responsible Person	James Heaver Assistant Principal of Care
Approved By	Board of Trustees
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Policy Applicable to	Whole charity

Date	Version	Person	Change / Action
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Part A

1. Safeguarding statement:

“Children have the right to be protected from all forms of violence (physical and mental). They must be kept safe from harm and they must be given proper care by those looking after them.”

United Nations Convention on the Rights of the Child, Article 19

We endeavour to provide a safe and welcoming environment where students 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. Safeguarding and promoting children and young people’s welfare is integral to our values and purpose as an organisation:

- We demonstrate our **care** and **commitment** for young people through our willingness to advocate their rights, recognise abuse or neglect wherever it may occur and to **communicate** these to the team around the child.
- We recognise the impact of discrimination and added vulnerability this may cause, so work to an ethos of **respect** and dignity.
- We set high safeguarding **standards**, in the knowledge that young people must be safe to thrive socially, emotionally and academically
- We take a **positive** approach to safeguarding, seeing the opportunity to learn from every experience.

We recognise that students who are Deaf are at an increased risk of abuse and harm and that they may have difficulties in communicating concerns to adults. We understand risk is further increased due to societal attitudes and assumptions or child/adult protection procedures which fail to acknowledge young people’s diverse circumstances, rather than the individual personality, impairment or circumstance. We are aware of these difficulties and seek to promote a culture of accessible, open communication so that concerns can easily be raised. It is our objective to safeguard all students across the Academy, whatever their background or circumstances. Child protection forms part of the Academy’s safeguarding responsibilities.

2. Who this document applies to

Every student at the Academy has the right to freedom from abuse and neglect. We have a wide range of students at the Academy including those classified as children, adults and adults at risk. In addition, our students have a wide range of needs including complex needs, emotional and behavioural difficulties, learning difficulties and autism. There may be some differences to administering this policy depending on age and capacity of the young person.

Everyone working at the Academy as a trustee, Governor, member of staff or volunteer has a duty to safeguard and protect our students and must read, understand and provide a signature to say they agree to work to this policy. They are issued with the Academy’s Safeguarding and Child Protection Policy; Part A (Part B/Appendices also issued for reference purposes) and Keeping Children Safe in Education; Part 1 and annex A, and are required to provide a signature as part of their induction to confirm that they have read and understood these documents. This applies to the Governing Body in relation to part 2 of the same guidance.

Anyone meeting our students or visiting our Academy must abide by our policies on safeguarding and child protection. Upon arrival all visitors and sub-contractors are provided with a safeguarding leaflet clearly explaining their responsibilities, the procedure for contacting the Welfare Team and provide a signature to acknowledge receipt of this.

Anyone visiting or working at the Academy must raise concerns with the Welfare Team at the earliest opportunity if they are worried about a young person.

Everyone who comes into contact with the Academy, as well as our children and young people, have a right to be protected from harm. This includes protection to an individual or organisation's reputation.

The Academy will support all children and young people by:

- Promoting a caring, safe and positive environment
- Encouraging a culture of ensuring that young people's voices are heard and their wishes and feelings are taken into account
- Promote a culture where children and young people know that their concerns will be treated seriously and they can safely express their views
- Responding sympathetically and supportively to distress and anxiety
- Ensuring that everybody in the setting understands their safeguarding responsibilities
- Recognising that a child or young person who is abused or witness to violence may feel helpless and humiliated, may blame themselves and find it difficult to develop and maintain a sense of self-worth
- Recognising that the Academy may provide the only stability in the lives of children and young people who have been abused or who are at risk of harm
- Providing a significant part in the prevention of harm by providing good lines of communication with trusted adults, supportive friends and creating an ethos of protection
- Liaising and working together with other support services and agencies, making appropriate referrals when necessary
- Encouraging self-esteem and self-assertiveness through the curriculum as well as our relationships
- Teaching children and young people to understand safeguarding, including online safety, and manage risk through both our curriculum and all aspects of Academy life
- Ensuring that children and young people know to whom they should turn for help and that they know that there is always an adult at the Academy that they can approach if they are worried or in difficulty
- Not condoning aggression or bullying in any form
- Ensuring all staff are aware of the Academy guidance for their use of mobile technology and understand their associated risks

3. Policy principals

- We always act with the best interests of the child or young person at heart
- We listen to any communication from young people or parents/carers and always take concerns seriously
- All children and young people regardless of age, gender, culture, language, race ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities
- We recognise that all adults, including temporary staff, volunteers and Governors, have a full and active part to play in protecting our students from harm and all share responsibility to act on any concern that may suggest a child or young person is at risk of harm
- All staff believe that our Academy should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of every child
- Staff involved in child protection issues will receive appropriate support and supervision as part of the ongoing appraisal and supervision process and also as need arises through peer supervision and de-briefs

4. Policy aims

The Deaf Academy recognises our responsibility to safeguard and promote the welfare of all students and we aim to ensure:

- Appropriate action is taken in a timely manner to safeguard and promote children and young people's welfare
- To raise the awareness of all staff of the need to safeguard children and young people and of their responsibilities in identifying and reporting possible cases of abuse
- Staff are properly trained in recognising and reporting safeguarding issues
- To develop a structured procedure within the Academy which will be followed by all members of the Academy community in cases of suspected abuse
- To demonstrate the Academy's commitment with regard to safeguarding and child protection to students, parents/carers and other partners
- To support the child's development in ways that will foster security, confidence and independence
- To provide an environment in which children and young people feel safe, secure, valued, believed and respected and feel confident to, and know how to approach adults if they are in difficulty
- To provide a systematic means of monitoring children and young people known or thought to be at risk of harm and ensure we, the Academy, contribute to assessments of need and support packages for those students
- To emphasise the need for good levels of communication between all members of staff
- To develop and promote effective working relationships with other agencies, especially the police, social care and the LADO/MASH
- To ensure that all staff working within our Academy who have substantial access to children and young people have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance), with a single central record kept for audit

5. Key personnel:

Designated Safeguarding Lead (DSL):

James Heaver - Assistant Principal for Care

jheaver@thedeafacademy.ac.uk

01395 203180 / 07763 625110

Deputy DSL(s):

- Sylvan Dewing – Principal

sdewing@thedeafacademy.ac.uk

01395 203132 / 07814 680090

- Mark Peel – Senior Safeguarding Caseworker

mpeel@thedeafacademy.ac.uk

07843 730851

- Louise Hammacott – Safeguarding Coordinator

lhammacott@thedeafacademy.ac.uk

01395 203168 / 07880 590246

Welfare Officers:

- Kate Whitney-Morris

kwhitneymorris@thedeafacademy.ac.uk

01395 203143 / 07387 021651

- Devina Jhundoo-Clayton

djhundooclayton@thedeafacademy.ac.uk

01395 203144 / 07768 133242

- Mark Shattock

mshattock@thedeafacademy.ac.uk

01395 203187 / 07938 249677

- Glen Hookway

ghookway@thedeafacademy.ac.uk

01395 203156 / 07947 735968

Rolle House Childrens' Home Designated Safeguarding Lead (DSL):

- Alex Stephens astephens@thedeafacademy.ac.uk
01395 203188 / 07773 022669

Designated teacher for Looked after children

- Jane Shann jshann@thedeafacademy.ac.uk

Welfare Team:

safeguardingteam@thedeafacademy.ac.uk 01395 2031111

Out of hours contact numbers:

07763 625110
07398 249677
07773 022669

Nominated safeguarding and child protection Governor:

- Alistair Dewhirst alistair.dewhirst@teinbridge.gov.uk

(alternatively, contact the Academy reception on 01395 203130, who will then contact Alistair Dewhirst on your behalf)

Chair of Governors:

- Tony Alexander chair@thedeafacademy.ac.uk

(alternatively contact the Academy reception on 01395 203130, who will then contact Tony Alexander on your behalf)

6. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2021\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

The following legislation and guidance has been considered when drafting this policy however this list is not exhaustive:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of students
- [Education and Training \(Welfare of Children\) Act 2021](#), which amends the Education Act 2002 and the Apprenticeships, Skills, Children and Learning Act 2009 to impose safeguarding duties on 16 to 19 academies and further education in essence ensuring that safeguarding responsibilities are understood and prohibiting funding being given if safeguarding requirements not complied with.
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of students at the school

- Part 1 of the schedule to the [Non-Maintained Special Schools \(England\) Regulations 2015](#), which places a duty on non-maintained special schools to safeguard and promote the welfare of students at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- [Charity Commission safeguarding guidance](#)
- This policy also complies with our funding agreement and articles of association.

7. Definitions

Safeguarding and promoting the welfare of children and young people means:

- Protecting children and young people from maltreatment
- Preventing impairment of children and young people’s mental and physical health or development
- Ensuring that children and young people grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children and young people to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm

Abuse is a form of maltreatment, and may involve inflicting harm or failing to act to prevent harm. Appendix 2 explains the different types of abuse

Neglect is a form of abuse and is the persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of health or development. Appendix 2 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as youth produced sexual imagery or sexting) is the sharing of sexual imagery (photos or videos) by children

Children includes everyone under the age of 18. There may be some differences to administering this policy depending on age and capacity of young people over the age of 18

Young people includes children and young adults; this will be used throughout this policy except in instances where guidance is only relevant to either children or young adults and not both

Adults/young adult includes everyone over the age of 18

Staff refers to all those working for or on behalf of the Academy, full or part time, temporary or permanent, in either a paid or voluntary capacity

Parent/carers refers to birth parents and other adults who are in a parenting role/guardians, for example step-parents, foster carers and adoptive parents

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

The local authority (LA)

A clinical commissioning group for an area within the LA

The chief officer of police for a police area in the LA area

8. Equality statement

Some young people have an increased risk of abuse, and additional barriers can exist in respect to recognition or disclosure. We are committed to anti-discriminatory practice and recognise young people's diverse circumstances. We ensure that all young people have the same protection, regardless of any barriers they may face.

Deaf children are particularly vulnerable to abuse. A research document commissioned by the NSPCC, 'Deaf and disabled children talking about child protection, 2015', states that Deaf and disabled children are at greater risk of experiencing child abuse and that the abuse of Deaf and disabled children is under reported and often hidden. Because of this it is especially important that all staff at the Academy keep a watchful eye for signs of abuse or neglect.

We give special consideration to young people who:

- Have special educational needs (SEN), disabilities or certain health conditions
- Have intimate care needs
- Are young carers
- Show signs of criminality / anti-social / gang related behaviour
- Go missing
- Experience any form of discrimination
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation, homelessness, chaotic and unsupportive home situations where there are issues such as substance abuse, domestic violence or where there is a family member in prison
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are living away from home
- Are viewed by others as a 'problem'
- Are vulnerable to being bullied or are engaged in bullying
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 15)
- Are missing from education
- Whose parents/carers have expressed an intention to home educate

9. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, trustees and Governors in the Academy and is consistent with the procedures of the 3

safeguarding partners. Our policy and procedures also apply to extended Academy and off-site activities.

All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), at least annually and at time of employment. Staff will provide a signature to say they have read and understood this. This applies to the Governing Body in relation to part 2 of the same guidance.

All staff will be aware of:

- Their responsibilities to safeguard and promote the welfare of young people
- What to do if they identify a safeguarding issue or a young person tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- Academy safeguarding procedures; including **recognising** concerns, **reporting** concerns to the Academy Welfare Team and ensuring concerns are **recorded** in an accurate and timely manner, or if necessary where a young person is at immediate risk reporting to the police, ambulance service, MASH or adult services.
- How to respond to a young person who discloses abuse through delivery of 'Working together to Safeguard Children', and 'What to do if you suspect a Child is being Abused, (2015).
- Our systems which support safeguarding, including this child protection and safeguarding policy, the disciplinary policy/capability policy, the role and identity of the Designated Safeguarding Lead (DSL) and deputies (DDSLs), the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's and adult's social care
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- All staff should take care not to place themselves in a vulnerable position with a young person
- All staff will be issued with an Academy ID badge and teal coloured lanyard, which must be visible at all times.

The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is **James Heaver**. The DSL takes lead responsibility for child protection and wider safeguarding and the role is explicit in the role holder's job description. The DSL is also responsible for ensuring the Safeguarding and Child Protection Policy remains up to date.

During term time, the DSL will be available during education hours for staff to discuss any safeguarding concerns.

The DSL / Welfare Team can be contacted outside of education hours via:

- Out of hours numbers; **077636 25110 / 07398 249677 / 07773 022669**
- Team email; safeguardingteam@thedeafacademy.ac.uk

When the DSL is absent, the deputies– (Sylvan Dewing, Mark Peel, Louise Hammacott) – will act as cover.

If the DSL and deputies are not available, other members of the Welfare Team will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to the whole Academy on student welfare, child protection and safeguarding matters
- Ensure staff compliance with Academy safeguarding procedures, to include clear identification of members of the Welfare Team and methods of referral/contact
- Organise child protection and safeguarding induction, regularly updated training and provide a minimum of annual updates for all Academy staff
- Ensure that all staff provide a signature to say they have read, understood and agree to work within the Academy's child protection policy (Part A), staff behaviour policy and Keeping Children Safe in Education Part 1 and annex A
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's/adult's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Refresh knowledge and skills at regular intervals (at least annually) and receive appropriate training every two years
- Ensure that detailed, accurate records are kept, of all concerns even if there is no need to make an immediate referral
- Ensure that safeguarding records are stored confidentially and retained in line with current GDPR / Academy retention guidelines
- Have an understanding of locally agreed processes for providing early help and intervention and will support members of staff where Early Help is appropriate
- Have a working knowledge of safeguarding arrangements for children and young people in Devon

The DSL will also keep the Principal informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and deputies are set out in their job descriptions.

Deputy Designated Safeguarding Leads (DDSL)

- DDSLs will be trained to the same standard as the DSL and, in the absence of the DSL, will carry out those functions necessary to ensure the ongoing safety and protection of students.

The Governing Board

The Governing Board will:

- Facilitate a whole-academy approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensure it complies with the law and hold the Principal to account for its implementation.
- Nominate a safeguarding and child protection Governor lead to monitor the effectiveness of this policy in conjunction with the full Governing Board. This is always a different person from the DSL.

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Principal, where appropriate (see appendix 6).

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), at least annually and at time of employment. Staff will provide a signature to say they have read and understood this. This applies to the Governing Body in relation to part 2 of the same guidance.

At least one member of the governing body will have completed safer recruitment training, to be repeated every five years.

Enhanced DBS checks (without barred list checks, unless the Governor is also a volunteer at the Academy) are in place for all Governors. A section 128 direction disqualifies a person from holding or continuing to hold office as a Governor of a maintained school. The Academy will follow this guidance.

The Principal

The Principal is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) volunteers, Governors and Trustees:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their young person joins the academy and via the academy website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and updating the content of this training regularly
- Ensuring that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with whistle-blowing procedures
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 6)
- Ensuring the relevant staffing ratios are met, where applicable

10. Confidentiality and information sharing

- Timely information sharing is essential to effective safeguarding
- Information sharing should be with the right people between and within agencies
- Staff should be mindful that early information sharing is vital for the effective identification, assessment and allocation of appropriate service provision
- Staff cannot promise to keep secrets, and 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 young people
- The Academy will contribute to inter-agency working in line with 'Working Together to Safeguard Children (2019)' and share information between professionals and agencies where there are concerns
- Staff have a professional responsibility to share information with other agencies in order to safeguard children and the Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- The DPA/GDPR (Data Protection Act/General Data Protection Regulation) does not prevent the Academy from withholding education data where doing so would be in the interests of a child in a refuge
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child or young person at risk
- Child protection and safeguarding issues warrant a high level of confidentiality, not only out of respect for the student and staff involved but also to ensure that information being released into the public domain does not compromise evidence
- Staff should only discuss concerns with the DSL, Principal, members of the Welfare Team or Chair of Governors. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis

- We will always undertake to share our intention to refer a child to MASH with their parents/carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with an external agency
- We recognise that all matters relating to child protection and safeguarding are personal to young people and families. Therefore, in this respect they are confidential and the Principal or DSLs will only disclose information to other members of staff on a need to know basis
- We recognise that young people over the age of 18 have the right to decide when and how information about them is shared with others, including with parents/carers. However, if withholding information puts either the young person themselves or others at risk of harm/significant harm, or if sharing information is assessed as being in the best interests of the young person, the Academy may deem it necessary to share information without obtaining consent. In these circumstances, whenever possible, the Academy will explain the rationale to the young person for breaking confidentiality and will explain how and who the information will be shared with prior to this being done
- If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or deputies)
- Following a number of cases where senior leaders in schools failed to act upon concerns raised by staff; 'Keeping Children Safe in Education (2021)' emphasises that any member of staff can contact children's social care if they are concerned about a child. We also follow this advice for making relevant referrals in relation to concerns about students over the age of 18
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- Confidentiality is also addressed in this policy with respect to record-keeping in section 18, and allegations of abuse against staff in appendix 6

11. Recognising abuse

Staff, volunteers and Governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or Deputy DSL’s)”.

If a young person is suffering or likely to suffer harm, or is in immediate danger

- Staff who **recognise** indicators of abuse or receive a disclosure should follow Academy safeguarding procedures:
 - **Report** your concern to the DSL (DDSL) immediately ensuring that information is received, i.e. share concern face-to-face, via telephone, video-call etc. do not just leave a message or send an email (see appendix 1)
 - Staff should **record** full and accurate details of any concerns raised, as directed by the DSL (DDSL), at the earliest opportunity
 - Safeguarding and Welfare leads will complete a signs of safety assessment (see appendix 1) for all concerns raised and will agree necessary actions and referrals
 - If the concern relates to a member of staff it should be **reported** immediately to the Principal
 - If the concern relates to the Principal, it should be **reported** to the Chair of Governors
- Referral should be made to children's/adult's social care and/or the police **immediately** if there is reason to believe a young person is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral**
- Tell the DSL as soon as possible if you make a referral directly
- When referring concerns consider what is known about the child's wider context (contextual safeguarding)

<https://www.gov.uk/report-child-abuse-to-local-council>

Managing disclosures

If a young person discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell them they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Do not communicate with the alleged abuser
- Follow the Academy's safeguarding procedure and report all concerns and disclosures immediately to the DSL (DDSL)
- Write up your conversation as soon as possible in the young person's own words. Stick to the facts, and do not put your own judgement on it then pass it on to the DSL
- Alternatively, if appropriate, make a referral to children's/adult's social care and/or the police directly, and tell the DSL as soon as possible that you have done so.
- Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Female genital mutilation (FGM)

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 2.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **student under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

Any member of staff who suspects a student is *at risk* of FGM or suspects that FGM has been carried out, or discovers that a student **aged 18 or over** appears to have been a victim of FGM, must speak to the DSL and follow Academy safeguarding procedures.

If you have concerns about a young person (as opposed to believing they are suffering or likely to suffer from harm, or are in immediate danger)

Concerns about a young person or a disclosure should be reported to the Welfare Team (as per procedure explained in Appendix 1) who will help decide whether a referral to MASH, Early Help, Care Direct or other support is appropriate in accordance with Devon Children and Families' Partnership threshold tool.

Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the academy will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to local authority children's/adult's social care or the police, the DSL/Welfare Team will make the referral, liaising with the three safeguarding partners and other agencies as required. This referral should be made the same day that the concern is raised. If there are any delays, for example, the concern is raised outside office hours, an explanation for this and any necessary risk assessment should be included in the recording. [NPCC- When to call the police](#) will help the Welfare Team to understand when they should consider calling the police and what to expect when they do.

(If in exceptional circumstances the DSL(DDSL) is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's/adult's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible).

Whenever possible we will inform families and/or young people that a referral is being made, unless to do so would increase risk (see section 10; confidentiality and information sharing).

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the young person's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves (see appendix 5)

Concerns about extremism

If a young person is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL(DDSL) first to agree a course of action.

(If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's/adult's social care. Make a referral directly, if appropriate. Inform the DSL as soon as practically possible after the referral).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children/adult's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and Governors can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger

- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

Mental health concerns

Mental health problems can, in some cases, be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a young person may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a young person that is also a safeguarding concern, take immediate action by following the Academy's safeguarding procedure.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Concerns about a staff member

If you have concerns about a member of staff (including a supply staff, Governor, trustee or volunteer), or an allegation is made about a member of staff posing a risk of harm to young people, speak to the Principal. If the concerns/allegations are about the Principal, speak to the Chair of Governors.

The Principal/Chair of Governors will then follow the procedures set out in appendix 6, if appropriate.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 6 for more detail).

Allegations of abuse made against other students (peer-on-peer abuse)

We recognise that young people are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of students harming other students will be dealt with under our academy's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the academy at risk
- Involves violence/serious youth violence
- Is domestic abuse perpetrated by an adolescent against a current or former partner
- Is abuse in an intimate relationship between peers
- Involves students being forced to use drugs or alcohol
- Involves harmful or problematic sexual behaviour; children and young people presenting with sexual behaviours that are outside the developmentally 'normative' parameters and harmful to themselves or others
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting (typically involves taking a picture under a person's clothing without them knowing; this is now a criminal offence) or sexually inappropriate pictures or videos (including sharing of nudes or semi-nudes)
- Involves sexual violence

Procedures for dealing with allegations of peer-on-peer abuse

If a young person makes an allegation of abuse against another student:

- You must report the allegation to the DSL (DDSL) immediately and record all information, as directed, but do not investigate it
- A signs of safety risk assessment will be undertaken in respect of all young people involved (including alleged victims, the young person against whom the allegation has been made and any others affected)
- The DSL will contact the local authority children's/adult's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- The Academy will investigate all allegations of peer-on-peer abuse in line with our safeguarding and behaviour procedures, and following advice from external agencies; this may include appointing an Investigation Manager to complete a formal investigation, clarification conversations, formal interviews and reviewing material evidence.
- The Academy will assess support, as part of our signs of safety assessment, on a case-by-case basis considering the support needs of victims, alleged perpetrators and anyone else affected.

Creating a supportive environment at the Academy and minimising the risk of peer-on-peer abuse

We recognise the importance of taking proactive action to minimise the risk of peer-on-peer abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

We will achieve this by:

- Establishing an ethos of respect, friendship, courtesy and kindness
- Maintaining high expectations of behaviour with a clear procedure for managing unacceptable behaviour
- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate children and young people about appropriate behaviour and consent
- Ensure children and young people are able to easily and confidently report abuse
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
 - That even if there are no reports of peer-on-peer abuse in the academy, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a young person's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Young people can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A young person's behaviour might indicate that something is wrong
 - That certain young people may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a young person harming a peer could be a sign that the young person is being abused themselves, and that this would fall under the scope of this policy

- The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

Sexual violence and harassment

Sexual violence and sexual harassment can occur:

- Between young people of any age and sex
- Through a group of young people sexually assaulting or sexually harassing a single child/young person or group of children/young people
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Young people who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, young people with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy.

Youth produced sexual imagery (sharing of nudes and semi-nudes)

Youth produced sexual imagery (sharing of nudes and semi-nudes) is the practice of children sharing sexual content and videos via text, email or social media. Such imagery involving anyone under the age of 18 is illegal and 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 of 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 of another person under the age of 18

Your responsibilities when responding to an incident

If you are made aware of an incident involving sharing of nudes and semi-nudes (also known as 'youth produced sexual imagery' or 'sexting'), you must report it to the DSL immediately. You should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off.

You must **not**:

- View, download or share the imagery yourself, or ask a student to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the student to delete it
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents/carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review / signs of safety assessment meeting. This will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult - cases where sexual imagery of people under 18 has been shared by adults or when sexual imagery has been shared by an adult to a child it is sexual abuse and should be treated accordingly
- There is 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 educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any student in the imagery is under 13
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

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 or received with the knowledge of the child in the imagery
- The child is more vulnerable than usual
- There is a significant impact on the children involved
- The image is of a severe or extreme nature

- The child understands consent
- The situation is isolated or if the image has been more widely distributed
- The other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances
- The children have been involved in previous similar incidents

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the students involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialing 101.

Recording incidents

All sharing of nudes and semi-nudes incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in this policy also apply to recording incidents of sharing of nudes and semi-nudes.

Curriculum coverage

Students are taught about the issues surrounding sharing of nudes and semi-nudes and online safety as part of our RSE education. Teaching covers the following in relation to sharing of nudes and semi-nudes, differentiated to meet needs of cohort as applicable:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation
- Students also learn the strategies and skills needed to manage:
 - Specific requests or pressure to provide (or forward) such images
 - The receipt of such images

Reporting systems for our children and young people

Where there is a safeguarding concern, we will take the young person's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring children and young people feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for children and young people to confidently report abuse
- Build positive relationships between students and staff
- Ensure that the Welfare Team is centrally located and easily accessible to all students
- Ensure our reporting systems are well promoted, easily understood and easily accessible to children and young people

- Make it clear to children and young people that their concerns will be taken seriously, and that they can safely express their views and give feedback

12. Notifying parents/carers

Where appropriate, we will discuss any concerns about a child with the child's parents/carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents/carers about any such concerns following consultation with the DSL.

If we believe that notifying parents/carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents/carers of all the children involved.

Permission will be sought by young people over the age of 18 prior to sharing information about them with parents/carers/outside professionals. If permission is not given information will only be shared if it is deemed to be necessary and in the young person's best interests. Wherever possible young people will be informed before information is shared about them.

13. Students with special educational needs, disabilities or health issues

We recognise that students with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Children and young people being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children and young people
- The potential for students with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

14. Students with a social worker

Students may need a social worker due to safeguarding or welfare needs. We recognise that a young person's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. The DSL and all members of staff will work with and support social workers to help protect vulnerable young people.

Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

15. Looked-after and previously looked-after children

The most common reason for children becoming looked after is as a result of abuse or neglect. We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads
- We have appointed a designated teacher, Jane Shann, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.
- As part of their role, the designated teacher will:
 - Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
 - Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how student premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

16. Mobile phones and cameras

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our academy aims to:

- Have robust processes in place to ensure the online safety of children and young people, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole academy community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- Educate children and young people about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online

- How to report any incidents of cyber-bullying, ensuring children and young people are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive regular refresher training
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to academy for their own use, but will limit such use to non-contact time when children and young people are not present
 - Staff will not take pictures or recordings of children and young people on their personal phones or cameras
- Make all children and young people, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in the academy, use of the academy's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, children and young people and parents/carers are aware that staff have the power to search children and young people's phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the academy's IT systems

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our academy's policy on online safety and the use of mobile phones, please refer to our e-safety policy and mobile phone policy, which can be found on sharepoint.

17. Screening

In order to keep students safe, the Academy may at times require students to undergo screening via a hand-held metal detector. The Academy will always request consent from the student to complete this and it may be carried out even if students are not suspected of carrying weapons. If a student refuses to be screened, we reserve the right to refuse them access to the campus. If objects or materials are found of an illegal or dangerous nature the police will be informed.

18. Whistle-blowing

We recognise that children and young people cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of safeguarding and child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the academy's safeguarding arrangements. If it becomes necessary to consult outside the academy, they should speak in the first instance, to the Area Education Officer/LADO following the Whistleblowing Policy (provided to staff at time of induction and available on the Academy website).

The NSPCC whistleblowing helpline (www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call; 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email; help@nspcc.org.uk.

Whistle-blowing in relation to the Principal should be made to the Chair of the Governing Body whose contact details are readily available to staff.

19. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the academy.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the academy has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

- Student safeguarding files are electronic
- Student safeguarding files are saved securely with restricted access
- Individual safeguarding incidents are recorded electronically on Behaviour Watch with restricted access to view

The Academy shares electronic information with other agencies securely, via Egress Switch, as appropriate.

In addition:

Appendix 6 sets out our policy on record-keeping with respect to allegations of abuse made against staff

20. Surveillance and monitoring

The use of surveillance and monitoring devices are for the protection of students only. CCTV cameras are used for site security and crime prevention and all cameras are external with the exception of exit/entrance cameras in residential and education buildings.

CCTV monitoring screens are only accessible to those staff who need to see the images at the time. This access is managed by designated staff.

Recordings are stored securely for one week and then recorded over unless there is a clear purpose for retaining footage for a longer period of time. This footage will be stored securely, for the stated purpose, and only for as long as necessary.

There will be clear signage around the campus to inform that CCTV cameras are in place.

Students' privacy should be respected at all times and information should only be shared if safeguarding concerns are raised.

Any complaints about the use of CCTV surveillance should be made through the Academy's complaints procedure.

21. Training

All staff

- All staff receive information about the Academy's safeguarding arrangements.
- All staff receive safeguarding and child protection training at induction in line with advice from Devon Children & Families' Partnership which is regularly updated. Staff will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings).
- All new staff complete group 2 online safeguarding training prior to their agreed start date. During their first day induction new staff will receive information about the Academy's safeguarding arrangements.
- All new staff will receive enhanced safeguarding training at the first available training session after their start date. This training will be delivered by safeguarding staff trained to group 5/safeguarding managers level.
- Enhanced safeguarding training will be regularly updated to reflect the needs of the academy and will be in line with advice from the 3 safeguarding partners. This training will be integrated, aligned and considered as part of the whole-academy safeguarding approach and wider staff training, and curriculum planning.
- Enhanced safeguarding training will have regard to the Teachers' Standards to support the expectation that all teachers manage behaviour effectively to ensure a good and safe environment and have a clear understanding of the needs of all children and young people.
- Training on online safety will be integrated with the whole Academy approach to safeguarding.
- All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), at least annually and at time of employment. Staff will provide a signature to say they have read and understood this. This applies to the Governing Body in relation to part 2 of the same guidance.
- Staff with safeguarding responsibilities will receive training from external providers, in addition to in-house enhanced safeguarding training.
- Existing staff will receive enhanced safeguarding training refreshers every two years. If for any reason staff are unable to attend this training before reaching their 2-year anniversary they will be required to complete group 2 online safeguarding training in the interim (if this is older than 2 years). They will then be required to attend enhanced safeguarding training on the next available date.
- The Safeguarding and Child Protection Policy is available via the Academy website and parents/carers are made aware of this policy, their entitlement to have a copy via the website and the responsibilities of staff members with regard to safeguarding and child protection procedures.
- The Academy provides a coordinated offer of Early Help when additional needs of children are identified and will contribute to Early Help arrangements and inter-agency working and plans.
- The name of the designated members of staff for child protection, the Designated Safeguarding Lead and deputies are clearly advertised in the Academy, alongside contact details for making referrals internally and externally.
- All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children and young people at risk of being drawn into terrorism and to challenge extremist ideas.
- Contractors, volunteers, Governors, trustees and any other relevant personnel will receive appropriate training as applicable.

DSL and deputies

- The DSL and deputies will undertake child protection and safeguarding training at least every 2 years
- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments)
- They will also undertake Prevent awareness training

Governors

All Governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the Chair of Governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal, they receive training in managing allegations for this purpose.

Recruitment – interview panels

The Academy operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations and by ensuring that at least one person on every interview panel has undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

22. Monitoring arrangements

The effectiveness of this policy in keeping children and vulnerable adults safe is monitored primarily by the care and safeguarding subcommittee that reports into the Governing Board. Part of the evidence supplied to the board is annual feedback from staff and students. In addition, the Welfare Team also review the effectiveness of safeguarding arrangements against statutory guidance.

23. Links with other policies

This policy links to the following policies and procedures:

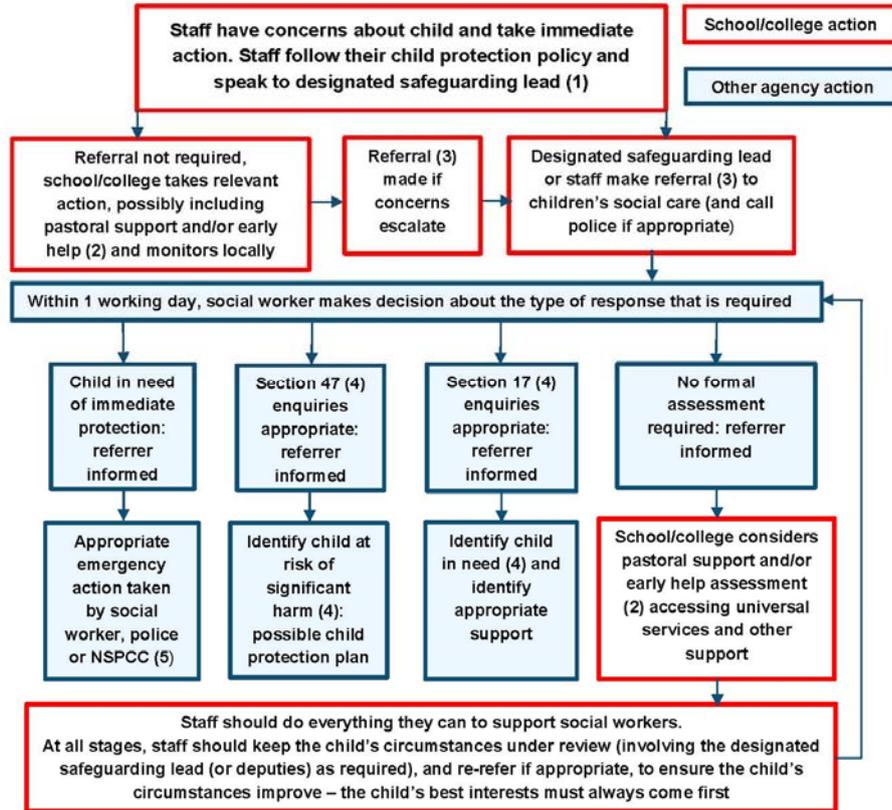
- Behaviour
- Whistle-blowing
- Anti-bullying
- Teaching and learning
- Administration of medicines
- Lanyard protocol
- RSE
- Appropriate touch
- Physical intervention
- E-safety, including staff use of mobile phones
- Risk assessment
- Recruitment and selection
- Health and safety
- Complaints
- Attendance
- Equality
- Relationships and Sex Education (RSHE)
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children – this has become a required policy
- Privacy notices

PART B

Appendix 1: Processes and procedures

Children Keeping Safe in Education (September 2021)

Actions where there are concerns about a child





Safeguarding Team

Are you worried about your safety or the safety of a friend? The Deaf Academy staff are here to help. Below are the Safeguarding Team, but you can talk to any member of staff if you feel worried.

Email us: safeguardingteam@exeterdeafacademy.ac.uk

Out of hours: 07763625110 / 07398 249677 / 07773 022669



James Heaver
Designated Safeguarding Lead
jheaver@exeterdeafacademy.ac.uk
07783 625110



Mark Peel
Deputy Designated Safeguarding Lead
mpeel@exeterdeafacademy.ac.uk
07843 730851



Sylvan Dewing
Principal
Deputy Designated Safeguarding Lead
sdewing@exeterdeafacademy.ac.uk
07814 68090



Louise Hammacott
Deputy Designated Safeguarding Lead
lhammacott@exeterdeafacademy.ac.uk
07880 590246



Alistair Dewhirst
Governor Lead responsible for Safeguarding and IAC
alistair.dewhirst@teignbridge.gov.uk



Alex Stephens
Safeguarding Officer (Care)
astephens@exeterdeafacademy.ac.uk
0777322669



Mark Shattock
Safeguarding Officer (Care)
mshattock@exeterdeafacademy.ac.uk
07938 249677



Glen Hookway
Safeguarding Officer (Education)
ghookway@exeterdeafacademy.ac.uk



Kate Whitney-Morris
Safeguarding Officer
kwhitney@exeterdeafacademy.ac.uk
07387 021851



Devina Jhundoo-Clayton
Safeguarding Officer
djhundoo@exeterdeafacademy.ac.uk
07768 133242

If you think you are not being treated right you can also contact:



Help at Hand
help.team@childrenscommissioner.gsi.gov.uk
childrenscommissioner.gov.uk/ask-question



Care Direct
customerservicecentre@directteam-mailbox@devon.gov.uk



Childline
childline.org.uk/get-support



Police non-emergency
Phone: 101 | Text phone: 18001 101




Signs of Safety Assessment and Planning Form



Student:

Date:

Contributing Staff:

Summary/Initial Description of Concern/Risk				
Danger/Risk	Safety Factors		Actions	
Potential Risks/Past Harm/Future Danger/Complicating Factors /Structural Inequality	Existing Strengths/Existing Protection/Controls /Existing Social Support/Balance with student's rights <ul style="list-style-type: none"> A person must be assumed to have capacity unless it is established that they lack capacity. A person is not to be treated as unable to make a decision unless all practicable steps to help him to do so have been taken without success. A person is not to be treated as unable to make a decision merely because he makes an unwise decision. 		Future Safety/Protection/Next Steps <ul style="list-style-type: none"> An act done, or decision made, on behalf of a person who lacks capacity must be done, or made, in their best interests. All actions to be made in a way that is the least restrictive of the person's rights and freedom of action. Impact on mental health and the wellbeing of all should be considered when deciding actions. Always consider 'Defensible Decision Making' 	
Initial Risk Assessment	Impact	Likelihood	Level (1-4)	Residual Risk (with actions to reduce risk)

Safeguarding our students
Worried that a child/young person/adult is at risk of harm or abuse?

Recognise

Recognise and be alert to the signs and indicators of possible a buse or harm
 "Where you have received a disclosure reassure the student that what they have said is important and we take it seriously"

Report

Report to the safeguarding team immediately*
 Ensure your message is received by calling 111, via Facetime/Zoom or discussing face-to-face (do not just send an email, leave a voicemail or record on Behaviour Watch/handovers)
 Out of hours: 07763 625110 / 07 398 249677

Record

The safeguarding team will advise you where to Record details of your concern and will support you to do this

If you are not satisfied with the Safeguarding Team's response you can and should refer to appropriate agencies yourself:
 MASH 0345 155 1071 mashsecure@devon.gov.uk
 CARE DIRECT 0345 1551 007 csc.caredirect@devon.gov.uk
 OFSTED contact.ofsted.gov.uk
 LADO 01392 384964 www.devon.gov.uk/lado
 POLICE non-emergency 101 emergency 999
 (Please note; some of these agencies are area specific)

*If the concern relates to a staff member report to the Principal. If it relates to the Principal report to the Chair of Governors: chair@exeterdeafacademy.ac.uk

NSPCC Guidance

Spotting the signs of abuse is not always easy. In some cases, professionals may be unable to see past a child's impairment to recognise the signs of abuse. A child experiencing abuse or attempting to disclose abuse may self-harm or display inappropriate sexual behaviour or other repetitive and challenging behaviours. This may be misunderstood as part of a child's disability or health condition and can prevent others from recognising the signs of abuse and taking action. Injuries such as bruising may not raise the same level of concern as they would if seen on a non-disabled child. Bruising on a disabled child may be assumed to have been self-inflicted or caused by disability equipment or problems with mobility.

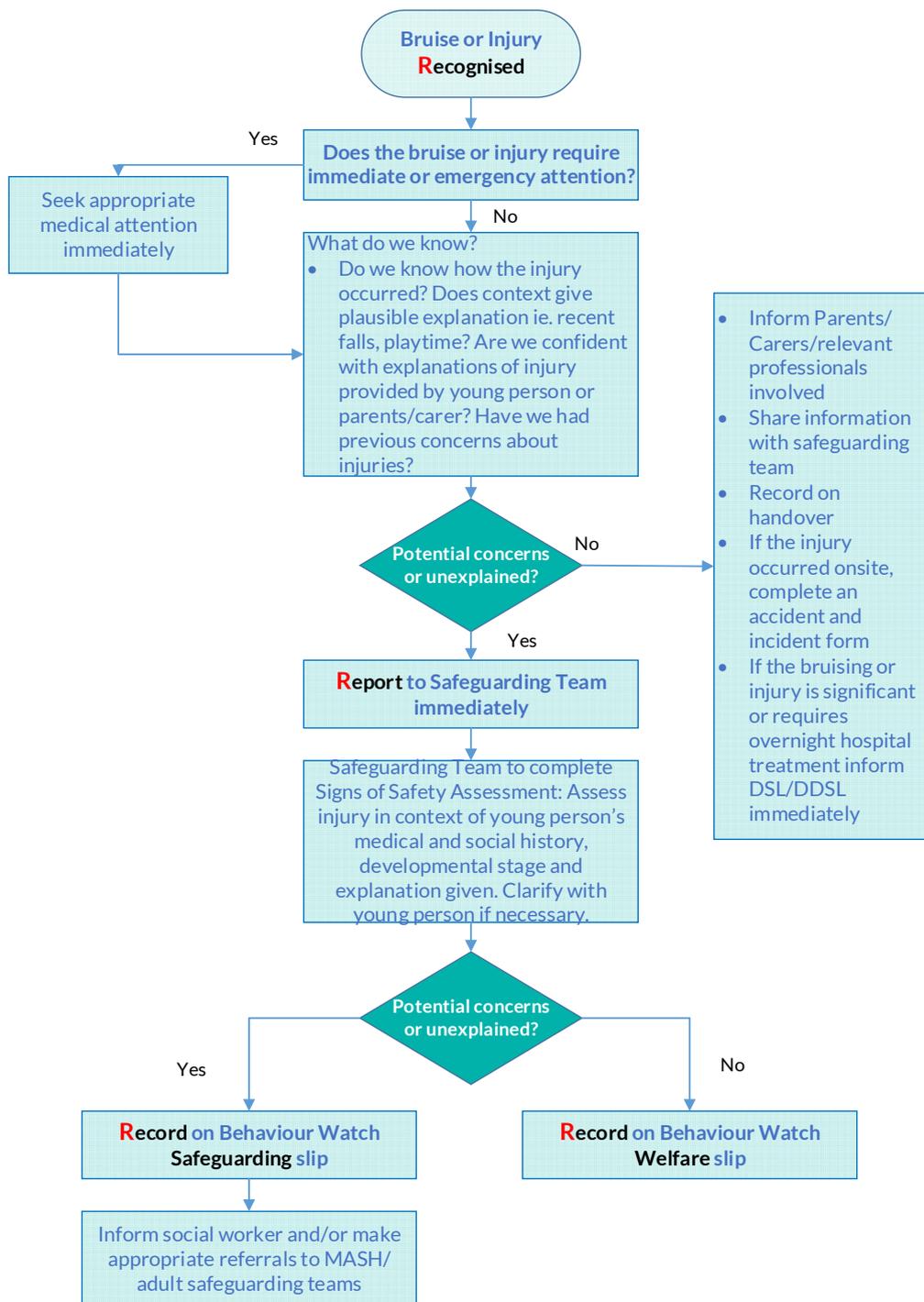
A bruise should never be interpreted in isolation and must always be assessed in the context of the child's medical and social history, developmental stage and explanation given. Any child who has unexplained signs of pain or illness should be seen promptly by a doctor.

Where would you expect to see bruising from an accidental injury?

- The shins and the knees are the most likely places where children who are walking, or starting to walk, get bruised.
- Most accidental bruises are seen over bony parts of the body – such as the knees and elbows – and are often seen on the front of the body.
- It is common to have fractures, particularly rib or metaphysical fractures, without any bruising.
- Accidental bruising in children with disability is related to the child's level of mobility, equipment used, muscle tone and learning ability.

When should you be concerned? There are some patterns of bruising that may mean physical abuse has taken place:

- Abusive bruises often occur on soft parts of the body – such as the abdomen, back and buttocks.
- The head is by far the commonest site of bruising in child abuse. Other common sites include the ear and the neck.
- As a result of defending themselves, abused children may have bruising on the forearm, upper arm, back of the leg, hands or feet.
- Clusters of bruises are a common feature in abused children. These are often on the upper arm, outside of the thigh, or on the body.
- Bruises which have petechiae (dots of blood under the skin) around them are found more commonly in children who have been abused than in those injured accidentally.
- Abusive bruises can often carry the imprint of the implement used or the hand. Non-accidental head injury or fractures can occur without bruising. Severe bruising to the scalp, with swelling around the eyes and no skull fracture, may occur if the child has been “scalped” – ie, had their hair pulled violently.



Remember:

- Do not ask leading questions, ask “how did you get the bruise/injury?”
- If young person is non-verbal use pictures or basic sign.
- If you are concerned in any way, report it immediately to the Welfare Team.
- Ensure that a de-brief is completed with the young person after the incident to ensure that they are okay. Record this!
- Do not contact parents or carers if injury is suspected to be abuse at home.

Checking the identity and suitability of visitors

All visitors will be required to sign in and out at reception. We will check their credentials and reason for visiting before allowing them to enter the setting. All visitors will be asked to produce photographic identification.

Visitors are expected to sign in electronically and wear a visitor's badge with coloured lanyard at all times (please refer to Academy lanyard protocol). On their first visit to the campus visitors will be provided with safeguarding information to include their responsibilities and contact details for the Academy Welfare Team.

Visitors to the academy who are visiting for a professional purpose, such as educational psychologists, school improvement officers and approved contractors may be added to the Academy's approved list, which is managed by HR. The approved list contains details of approved contractors and authorised personnel who have completed our required contractor checks. Visitors to site on the approved list will be issued with a yellow lanyard which allows them to access areas of the site unescorted.

All other visitors, including visiting speakers, will be issued with a red lanyard and will be accompanied by a member of staff, or visitor on the Academy's approved list, at all times. We will not invite into the academy any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using academy facilities is not seeking to disseminate extremist views or radicalise students or staff.

Non-collection of children

If a child is not collected as expected at the end of the session/day, we will:

- Wait with the child for a period of 5-10 minutes
- After this time:
 - If it is local authority arranged transport, we will make attempts to contact the relevant local authority. If transport is going to be longer than 10-15 minutes we will inform parents/carers of the delay. If we cannot contact main carer we will attempt to call others on the student's contact list
 - If transport is arranged by parents/carers, we will make attempts to contact main carer. If we cannot contact main carer we will attempt to call others on the student's contact list
- If contact is successful we will agree with family/transport about the supervision of the child until they are collected
- If contact is unsuccessful it will be reported to the Welfare Team
- All incidents of non-collection will be recorded as directed by the Welfare Team

Appendix 2 – Types and indicators of abuse

Signs and indicators of abuse

Signs of abuse:

The following non-specific signs may indicate that something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious or unexplained injuries
- Lack of self-esteem
- Self-injury
- Age inappropriate sexual behaviour
- Child sexual exploitation

Risk indicators:

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with the DSL
- May require consultation with and/or referral to Children's/Adult's Services

The absence of such indicators does not mean that abuse or neglect has not occurred. In an abusive relationship the child may:

- Appear frightened of their parents/carers
- Act in a way that is inappropriate to their age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

Staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the academy or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. Child mental health is also recognised as a factor of vulnerability.

Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical

Physical abuse is deliberately hurting or injuring someone. This could include hitting, smacking, pushing, shaking, spitting, pinching, scalding, misusing medication, inappropriate restraint, inappropriate physical punishments or other ways of causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or young person.

Emotional

Emotional abuse, also referred to as psychological abuse, is the persistent emotional maltreatment of a child or young person such as to cause severe and adverse effects on their emotional development. It can also be the attempt to scare, control or isolate an individual by intimidation or fear. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child or young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child or young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people

Sexual abuse

Involves forcing or enticing a child, or an adult who does not or cannot agree, to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or young person 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, touching outside of clothing or activity where there is an imbalance of power
- 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). It can also include sexual exposure, inappropriate looking, sexual harassment, or sexual photography without consent

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children and young people.

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance

and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some young people, educative inputs may be enough to address the behaviour.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- **Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- **Consent** – agreement including all the following:
 - Understanding what is proposed based on age, maturity, development level, functioning and experience
 - Knowledge of society’s standards for what is being proposed
 - Awareness of potential consequences and alternatives
 - Assumption that agreements or disagreements will be respected equally
 - Voluntary decision
 - Mental competence
- **Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Further information and advice is available in the Devon multi-agency protocol “Working with Sexually Active Young People” available at www.devon.gov.uk/safeguarding.

Neglect

The persistent failure to meet an individual’s basic physical and/or psychological needs, which is likely to result in the serious impairment of the child’s or young person’s health or development.

Neglect may be deliberate or through failing to understand needs. Neglect may occur during pregnancy as a result of maternal substance abuse.

Everyone has the right to access the necessities of life, such as food, shelter, clothing, heating, stimulation and activity.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child or vulnerable adult's basic emotional needs

Self-neglect

Self neglect is when a person being unable, or unwilling, to care for their own essential needs. It can cover a wide range of behaviour including neglecting personal hygiene, health or surroundings, refusal of necessary support and obsessive hoarding. This type of behaviour has serious implications for the health and wellbeing of the person concerned and for the people who care for and support them.

What is self neglect?

- lack of self-care to an extent that it threatens personal health and safety
- neglecting to care for one's personal hygiene, health or surroundings
- inability to avoid harm as a result of self-neglect
- failure to seek help or access services to meet health and social care needs
- inability or unwillingness to manage one's personal affairs

Bullying including cyberbullying

Our Academy policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under safeguarding and child protection procedures. This includes all forms e.g. cyber, racist, homophobic, gender or any other form of discrimination related bullying. We keep a record of known bullying incidents which is shared with and analysed by the governing body. All staff are aware that young people with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Principal and the DSL will consider implementing child protection procedures.

The subject of bullying is addressed at regular intervals in RSE education.

Racist incidents/homophobic/trans-phobic/language/equality act 2010

We acknowledge that repeated incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents reportable under the Equality Act 2010.

The Academy uses a reporting system to record any incidents in line with the latest DFE guidance.

The DSL is trained and understands how to report Hate Crime. The DSL understands how to refer to Devon Intercom Trust & Transfigurations for any young person requiring LGBTQ support.

Child criminal exploitation

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

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

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

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

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

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveler families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the academy without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Students will be entered on the admission register at the beginning of the first day on which the Academy has agreed, or been notified, that the student will attend. If a student fails to attend on the agreed or notified date, or on the first day a student is absent without authorisation, the Academy will undertake reasonable enquiries to establish the young person's whereabouts and consider notifying the local authority at the earliest opportunity.

The Academy will monitor students' attendance through their daily register. The Welfare Team will monitor unauthorised absences and take appropriate action including notifying the local authority, particularly where children go missing on repeat occasions from the Academy day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities'.

We recognise the need for heightened awareness where a young person may not have capacity to call for help and respond at a very early stage if they do not arrive at expected. Wherever possible we keep at least two numbers for all parents and carers and have clear steps to follow in these circumstances; if a student is absent and no reason has been provided by 9:20 reception will initiate contact with home. If no response is received within two hours the absence will be referred to the Welfare Team for assessment.

Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage

Child sexual exploitation

Child sexual exploitation (CSE) is a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators/vulnerability factors of CSE can include a child:

- Going missing from home or school
- Regular school absence/truanting
- Underage sexual activity
- Inappropriate sexual or sexualised behaviour
- Sexually risky behaviour, 'swapping' sex
- Repeat sexually transmitted infections
- In girls, repeat pregnancy, abortions, miscarriage
- Receiving unexplained gifts or gifts from unknown sources
- Having multiple mobile phones and worrying about losing contact via mobile
- Online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images including nude and semi-nude images and/or videos
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- Changes in the way they dress
- Going to hotels or other unusual locations to meet friends
- Seen at known places of concern
- Moving around the country, appearing in new towns or cities, not knowing where they are
- Getting in/out of different cars driven by unknown adults
- Having older boyfriends or girlfriends
- Sexual identity
- Contact with known perpetrators
- Involved in abusive relationships, intimidated and fearful of certain people or situations
- Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- Associating with other young people involved in sexual exploitation
- Recruiting other young people to exploitative situations
- Truancy, exclusion, disengagement with education, opting out of education altogether
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- Mood swings, volatile behaviour, emotional distress
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- Drug or alcohol misuse
- Getting involved in crime
- Police involvement, police records
- Involved in gangs, gang fights, gang membership
- Injuries from physical assault, physical restraint, sexual assault

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate. The DSL will use the Devon Children & Families' Partnership CSE Risk Assessment Tool and guidance on all occasions when there is a concern that a child is being or is at risk of being sexually exploited. In all cases if the tool identifies any level of concern the DSL should contact their local MACSE (Missing and Child Sexual Exploitation) and email the completed CSE screening tool along with a MASH enquiry form. If a child is in immediate danger the police should be called on 999.

County Lines

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

- Can affect any child or young person (male or female) under the age of 18 years
- Can affect any vulnerable adult over the age of 18 years
- Can still be exploitation even if the activity appears consensual
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- Can be perpetrated by individuals or groups, males or females, and young people or adults
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including cognitive ability, physical strength, status, and access to economic or other resources.

Domestic abuse

Children and young people can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child or young person may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children and young adults may also experience domestic abuse and/or violence in their own personal relationships.

Domestic abuse can include aspects of physical, sexual, emotional, financial, and psychological abuse to maintain power and control over another person. Coercive control is a type of domestic abuse that doesn't necessarily result in physical violence and is recognised as a criminal offence. Abusive behaviour can occur even after a relationship has ended.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and young people.

If police, in an area covered by Operation Encompass, are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child or young adult's welfare.

The DSL will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

Modern slavery

Increased awareness and reporting helps law enforcement to tackle the perpetrators of modern slavery as well as protecting victims.

- Modern Slavery is a serious and often hidden crime in which people are exploited for criminal gain. The impact can be devastating for the victims.
- Modern slavery comprises slavery, servitude, forced and compulsory labour and human trafficking.
- There were an estimated 40 million people in slavery globally in 2016 and 10,000 – 13,000 potential victims in the UK, however many victims are not identified or reported.
- The common factors are that a victim is, or is intended to be, used or exploited for someone else's (usually financial) gain, without respect for their human rights.
- The perpetrators seeking to take advantage of them could be private individuals, running small businesses or part of a wider organised crime network.
- For adult victims, there will be some element of coercion involved, such as threats, use of force, deception, or abuse of power. For example, perpetrators may:
 - Find out personal information about the victim and then use threats against their family in order to manipulate and control the victim.
 - Use the victim's fears about their immigration status to control them.
 - Deceive them with false promises of legitimate jobs.
- There are many more examples. Victims may appear to give consent, but in reality they have little ability to choose leave the exploitative situation and the perpetrators have still committed a crime.
- Child victims and vulnerable adults are not able to give informed consent and therefore exploitation even without any element of coercion could constitute modern slavery.

Online Safety

Some adults and other children use technology to harm others. Harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in sexual behaviour such as webcam photography or face-to-face meetings. Student may be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

The Academy has a range of approaches and strategies to ensure students remain safe online; this includes digital security, environmental risk assessments, campus safeguarding procedures and student specific risk assessments. Students are taught about online safety throughout the curriculum.

When responding to relevant incidents the Academy will follow guidance on sharing nude and semi-nude images and videos published by the [UK Council for Internet Safety \(UKCIS\) \(UKCIS, 2020\)](#)

Online Abuse

Online abuse is any type of abuse that happens on the internet, for example through social media, or mobile phones. Online abuse covers a wide range of behaviours and technologies.

Some examples of online abuse can include:

- trolling
- stealing someone else's identity
- cyber-stalking
- [cyberbullying](#)

It can be obvious when someone is being abusive online but the boundary between expressing a point of view and being abusive isn't always clear.

A good way to look at it is to apply the same standards of behaviour online as you would in person. If someone says something that would be unacceptable face-to-face, it doesn't make it acceptable just because it is online.

Additionally, online abuse could be a criminal offence, and should be reported to the police. Some examples of this could include:

- Sending messages online that are grossly offensive or of an indecent, obscene or menacing character.
- Publishing private sexual images online without consent. This is more commonly known as 'revenge porn'.

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces, whether in this country or overseas

Extremism is defined by the Crown Prosecution Service as:

The demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs
- Seek to provoke others to terrorist acts
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The Prevent Duty for England and Wales (2015), under section 26 of the Counter-Terrorism and Security Act 2015, places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify young people at risk.

We will assess the risk of young people in our academy being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

Opportunities are provided in the curriculum to enable students to discuss issues of religion, ethnicity and culture and the Academy follows the DfE advice 'Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014)'.

We will ensure that suitable internet filtering is in place, and equip our students to stay safe online at the academy and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Young people who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

Indicators of vulnerability include:

- Identity Crisis; the student is distanced from their cultural/religious heritage and experiences discomfort about their place in society
- Personal Crisis; the student may be experiencing family tensions; a sense of isolation; and low self-esteem They may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging
- Personal Circumstances; migration; local community tensions; and events affecting the student, country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations; the student may have perceptions of injustice; a feeling of failure; rejection of civic life
- Experiences of Criminality; which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration
- Special Educational Need – students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others

If staff are concerned about a student, they will follow our Academy safeguarding procedures.

Private fostering

A private fostering arrangement occurs when someone other than a parent/carer or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents/carers. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

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

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

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

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

HBA is a violation of human rights and may be a form of physical, domestic and /or sexual abuse.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM (female genital mutilation)

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

(FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

Section 5B of the 2003 Act¹ introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in under 18s, which they identify in the course of their professional work, to the police. The duty came into force on 31 October 2015.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place

- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Mentioning something was done to them that they are not allowed to talk about
 - Secretive behaviour, including isolating themselves from the group
 - Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM include:

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced in the girl's community or country of origin. 'At risk' communities include Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan
- A parent/carer or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example).

Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 32-36 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at <https://www.gov.uk/guidance/forced-marriage>. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

Peer-on-peer abuse

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Peer-on-peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

Serious youth violence

Any offence of serious violence or weapon enabled crime, where the victim is aged 1-19 i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences.

Indicators which may signal that children are at risk from, or are involved with serious violent crime; These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school

- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Organisational abuse

Organisational abuse is the inability to provide a good level of care to an individual or group of people in a care setting such as a hospital or care home, or in a person's own home if they receive care assistance there. It may be a one-off incident, repeated incidents or on-going ill-treatment. It could be due to [neglect](#) or poor care because of the arrangements, processes and practices in an organisation. This could include:

- a lack of dignity or respect in a care setting
- rigid routines or processes organised to meet staff needs rather than the individuals
- disrespectful attitudes towards individuals receiving care
- a culture of abusive behaviour or tolerance of abusive behaviour
- repeated failure to prevent [abuse](#), or [neglect](#) within a service; including incorrect use of restraint, isolation, or unauthorised deprivations of liberty

Stalking

Stalking can be defined as persistent and unwanted attention that makes an individual feel pestered and harassed. It includes behaviour that happens twice or more, directed at or towards an individual by another person, which causes them to feel alarmed or distressed or to fear that violence might be used against them. What makes the problem particularly hard to cope with is that it can go on for a long period of time, making the victim feel constantly anxious and afraid. Sometimes the problem can build up slowly and it can take a while for the individual to realise that they are caught up in ongoing abuse. The problem isn't always 'physical' – stalking can affect people psychologically as well. Social media and the internet are often used for stalking and harassment, and 'cyber-stalking' or online threats can be just as intimidating.

Discriminatory abuse

Discriminatory abuse is the unequal treatment of an individual based on age, disability, gender and gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation.

Discriminatory abuse can include suffering insulting language, harassment or ill-treatment due to these personal characteristics.

Hate crime

Hate crimes are any criminal acts that are targeted at a person because of hostility or prejudice towards a person's disability, race and ethnicity, religion or belief, sexual orientation, and gender identity.

Acts can include physical attacks, verbal abuse, harassment, damage to property, or bullying.

Financial abuse

Financial abuse can involve theft, [fraud](#), [scamming](#) and exploitation. It can also be when a person is coerced into certain financial affairs or arrangements, including pressure in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. [Blackmail](#) is a type of abuse that can be used for financial gain and may involve using threats of physical, mental or emotional harm, or of criminal prosecution, against a victim or someone close to them.

Indicators of financial abuse include:

- Substantial increase in account activity, particularly when a joint bank account has recently been established or someone is now assisting the individual with their finances
- Person with a disability is accompanied by family, staff or others who appear to coax, or otherwise pressure, the individual into making transactions
- Individual is confused about missing funds in accounts

Appendix 3 – Local contacts



For Early Help, Consultation and Enquiries please contact:

Telephone: **0345 155 1071**

E-mail: mashsecure@devon.gov.uk mashsecure@devon.gov.uk

Fax: 01392 448951

Enquiry Form available at:

www.devon.gov.uk/mash-enquiryform.doc

Post: Multi-Agency Safeguarding Hub, P.O. Box 723, Exeter EX1 9QS

Emergency Duty Team – out of hours

0845 6000 388

Police – non emergency – 101

For all **LADO** enquiries Exeter (01392) 384964, or

<http://www.devon.gov.uk/lado>

Early Help Team

Senior Manager: Philippa Court

Exeter Team Manager Stephen Matthewman **07790362310**

Northern Devon Team Manager Sarah Simpson **07854304512**

South & West Devon Team Manager Karen Hayes **07854253424**

Mid & East Devon Team Manager Ian Flett **07815562370**

0345 155 1071, ask for Early Help earlyhelpsecure@devon.gov.uk

Appendix 4

The seven golden rules to sharing information

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Appendix 5

Safeguarding escalation procedure

Contents

1. Introduction
2. Potential Areas of Disagreement
3. Stage One: Preventing Disputes
4. Stage Two: Informal Dispute Procedure
5. Stage Three: Formal Dispute Procedure
6. Stage Four: Where Disagreements Remain
7. DCFP Case Resolution Protocol

1. Introduction

At the Academy we believe effective safeguarding of children/vulnerable adults is absolutely predicated on practitioners and front line staff wanting the very best for young people and being ready to stand up in their best interest's even if this brings them into disagreement with other practitioners, with other organisations or with their own managers and employing bodies.

At no time must professional disagreement detract from ensuring that the child or vulnerable adult is safeguarded. The child's/vulnerable adult's welfare and safety must remain paramount throughout.

It is acknowledged that each authority, agency or organisation may have their own individual escalation policy. We at the Academy are committed, where possible, to use these policies along with our own and hold the specific policies for the authorities, agencies and organisations that we work with regularly. This policy will be shared with all new and existing partners.

This procedure identifies a non-exhaustive list of potential areas of disagreement and guidance on preventing disputes. It also contains procedures to be followed when disputes cannot be resolved through discussion and negotiation between professionals.

2. Potential Areas of Disagreement

A referral not considered to meet the threshold for assessment by Children's social care/Adult Safeguarding HUB;

- Children's social care/Adult Social Care conclude that further information should be sought by the referrer before a referral is progressed
- There is disagreement as to whether the child protection procedures/adult safeguarding procedures should be invoked
- Children's social care/Adult Social Care and the Police place different interpretations on the need for significant agency response in relation to a child protection enquiry
- There is a disagreement over the sharing of information and/or provision of services
- There is disagreement over the outcome of any assessment and whether the appropriate action plan is in place to safeguard and promote the welfare of the child/vulnerable adult
- There is a concern over delays in allocation, processing decision making on a safeguarding concern

- Concerns over the quality of safety plans

3. Stage One: Preventing Disputes (information sharing)

Most disagreements can be resolved through **effective sharing of information** discussion and negotiation. The professionals involved should attempt to resolve differences through discussion within one working day, but if they are unable to do so, their disagreement must be reported by them to their line managers or equivalent.

With respect to most day-to-day issues, the relevant line managers will be able to resolve the disagreement. This contact should take place within twenty-four hours. The purpose of this contact is to review the available information and to resolve the concern. It may be helpful to consider the involvement of the designated or named professional at this stage in preference to use of line management.

We need to feel assured that children or vulnerable adults are safe and therefore will require (as appropriate) full copies of decisions and reports that have led to rationales not to meet thresholds (children and vulnerable adults), not to take further action (police) or not complete capacity and other assessments.

In addition, we will also require copies of safety plans to ensure that all risks have been identified and appropriate controls put in place.

Any action agreed should be fed back immediately to the relevant managers involved and the detail of the conflict and agreements reached should be recorded on the child's file.

1A: Requests for further information/informally questioning judgement.

1 B: Raising a concern formally with the professional concerned by email.

4. Stage Two: Informal Dispute Procedure

Where it is not possible to resolve the matter at front line management level, the matter should be **referred without delay** to second tier management level.

The issue will then be considered at second tier management level and/or include Team Around the Family, with direct communication taking place with the designated professional or named professional for safeguarding within the individual agency or at a second tier management level.

If the area of conflict relates to whether a case meets the threshold for a referral or service from children's social care, then the Early Help Assessment/TAC Implementation Officer will also be involved in this discussion.

5. Stage Three: Formal Dispute Procedure

If despite following the Stage Two process the disagreement remains, the matter will be referred to an appropriate Head of Service within Specialist Children's Services or Adult Services, who will consider the matter with their equivalent level of management within the concerned agency who is in dispute.

The purpose of escalating the dispute to this level is to reach a position where differing professional opinions have been taken into account and efforts made to explore whether the dispute has arisen through lack of clarity or understanding in the professional dialogue. Ultimately a decision will need to be reached where agencies agree a way forward where the interests of the child take precedence over a professional stalemate.

6. Stage Four: Where Disagreements Remain

In the unlikely event that the professional disagreement remains unresolved, the matter must be referred to the Head of Safeguarding, who will determine a course of action including reporting the matter to the Devon Children and Families Partnership (DCFP) Chair.

In all cases where it has not been possible to resolve differences and/or where there may be lessons to be learned for future practice, consideration should be given to holding a multi-agency case review.

At any stage of the process, any action agreed should be fed back immediately to the second tier management staff involved and the detail of the conflict and agreements reached should be recorded on the child's file.

All disputes should be resolved in a timely way so that the welfare of the child remains paramount. In some situations, it may be required to instigate all of the stages within a short period of time or to escalate the process so that the safety of the child is not compromised.

DCFP Case Resolution Protocol

The Devon Children and Families (DCFP) Case Resolution Protocol sets out how significant case disagreements will be managed within the DCFP. It seeks to be more than an escalation procedure – essentially it sets out an approach to resolving conflict and to ensure children's needs remain at the heart of all we do. <https://www.devon.gov.uk/eycs/case-resolution-protocol>

Appendix 6

Managing allegations against staff policy and procedure

Introduction

This policy is to be used where there are allegations or concerns about staff, teachers, trustees/Governors or volunteers. This policy is derived from the statutory guidance issue in *Working Together to Safeguarding Children July 2018* and *Keeping children safe in Education Sept 2021*.

The background

- Young people, particularly Deaf and disabled young people, can be at risk from those who care for them. This policy aims to ensure any concerns about their welfare with staff, trustees/Governors and volunteers are taken seriously and that their safety and welfare is given paramount consideration.
- Caring for young people can be a challenging job and the Academy has a duty of care to keep staff safe, particularly when an allegation is made or a concern is raised. This policy helps to ensure they receive support, that the concern is dealt with promptly, and that decisions are fair.
- This policy covers low level concerns or allegations relating to staff, agency staff, trustees/Governors and volunteers still working at the Academy. Historical allegations should be referred to the police.
- We want any concern, however small, to be shared with the Academy to create an open and transparent culture, minimise the risk of abuse, and respond early to issues that could later become allegations. Any concern can be shared directly with the Welfare Team.
- Concerns can be raised by staff confidentially. In the most serious cases their anonymity may be waived for evidence at a court or tribunal.

Reporting concerns

- All staff, agency staff, trustees/Governors and volunteers are under a duty to immediately report concerns they have to the Principal (or member of SLT in their absence), who will ensure they are investigated. While staff may not be given confidential information about the outcome, they must be satisfied the information has been taken seriously and that children and young people are safe.
- If a concern relates to Principal, then the Chair of Governors should be contacted.
- If a member of staff is unable to speak to the Principal (or member of SLT in their absence) or the Chair of Governors they may approach the Local Authority Designated Officer (LADO) or follow the Academy's Whistleblowing Policy.

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- **Behaved in a way that has harmed a child, or may have harmed a child, and/or**
- **Possibly committed a criminal offence against or related to a child, and/or**
- **Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or**

- **Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of Academy**

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. The case manager will be allocated by the Principal (or member of SLT in their absence), or the chair of governors where the Principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement. We follow the same processes to manage allegations relating to young people over the age of 18 as for children under the age of 18.

A confidential record of the allegation will be recorded on our confidential safeguarding system (Behaviour Watch).

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or young person is at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the Academy so that the individual does not have direct contact with the child or young person concerned
- Providing an assistant to be present when the individual has contact with children and young people
- Redeploying the individual to alternative work in the Academy so that they do not have unsupervised access to children and young people
- Moving the child or young person to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted (if under 18 or with permission if over 18)
- Temporarily redeploying the individual to another role in a different location

If in doubt, the case manager will seek views from the Academy's HR team and the designated officer at the local authority, as well as the police and children's/adult's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's/adult's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children/young people or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's/adult's social care services, where necessary). Where the police and/or children's/adult's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children/young people at the Academy is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's/adult's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children/young people in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's/adult's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the Academy and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in Academy and/or liaise with the police and/or children's/adult's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Individuals can also access support via the Employee Assistance Programme, which offers a 24-hour helpline from Health Assured to support through any issues or problems.
- Inform the parents or carers of any child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). Inform the parents or carers of any young people

over the age of 18 with their consent, unless it is deemed to be in their best interests to inform parents/carers without permission. The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep parents or carers informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the Academy is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the Academy will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the Academy's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the Academy, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- A member of SLT or the governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the Academy, while the Academy carries out the investigation
- We will involve the agency fully, but the Academy will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken, wherever possible, within 3 working days
- If a disciplinary hearing is required, where this can be held without further investigation, should be held within 15 working days
- 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's/adult's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the Academy ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the Academy will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the Academy will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or young person who made the allegation, if they are still attending the Academy.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child or young person and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's/adult's social care may be appropriate
- Shown to be deliberately invented, or malicious, the Academy will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child or young person and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's/adult's social care may be appropriate
- Shown to be deliberately invented, or malicious, the Academy will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The Academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's/adult's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared

- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/young person involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records, on Behaviour Watch, about any case where the allegation or concern meets the criteria above and also store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file), although it will remain on the confidential safeguarding file (Behaviour Watch).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the Academy will provide a copy to the individual, in agreement with children's/adult's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the Academy's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension

- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the Academy that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, young person, parent or other adult within or outside the Academy
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children and young people.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the Academy may have acted in a way that:

- Is inconsistent with the values of the organisation, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children and young people
- Having favourites
- Using personal mobile phones for work purposes
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the Academy's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the Principal (or member of SLT/HRM in their absence) will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Principal (or member of SLT/HRM in their absence) will use the information collected to categorise the type of behaviour and determine any further action, in line with the Academy's disciplinary policy.

All concerns should be raised in writing and sent to the Principal, DSL or HR Manager (HRM).

Options for responding to low-level concerns may include:

- Privately talking with staff involved
- Listening to their point of view
- Agreeing improvements to be made
- Setting up a training or development plan
- A recorded reflective conversation with staff involved (notes to be held on staff members files)

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the Academy

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 7

COVID-19 school closure arrangements for Safeguarding and Child Protection

School Name: the Deaf Academy

Policy owner: Louise Hammacott

Date: 30/03/2020

Date shared with staff:

Context

From 20th March 2020 parents/carers were asked to keep their children at home, wherever possible, and for schools to remain open only for those children of workers critical to the COVID-19 response - who absolutely need to attend.

Schools/colleges and all childcare providers were asked to provide care for a limited number of children –

- **children who are vulnerable, and**
- **children whose parents/carers are critical to the COVID-19 response and cannot be safely cared for at home**

This appendix of the Safeguarding, and Child Protection policy contains details of our individual safeguarding arrangements used during this period of time and will be reviewed in the event of subsequent lockdowns in line with the advice released by the LA or DfE.

It remains the case that **safeguarding is everybody's responsibility**, therefore this additional information needs to be shared with all staff and volunteers who in turn must read, digest and seek support from their Welfare Team or Academy leaders if further clarification is required. All staff should continue to have access to the Child Protection policy and Keeping Children Safe in Education (KCSiE) 2021 where further details and information can be found.

The Academy's Welfare Team (DSL, Safeguarding Governor etc) and their contact details can be found in the main body of the School's/college's Safeguarding Policy. Any changes to the DSL and DDSL during exceptional circumstances will be found in para 3 of this appendix. Any changes will be shared with all staff and volunteers of the school.

Context

Key Contacts

Vulnerable children

Critical workers

Attendance monitoring

Online Academy attendance/contact/wellbeing monitoring and escalation process

Designated Safeguarding Lead

Reporting a concern

Safeguarding Training and induction

Safer recruitment/volunteers and movement of staff

Single Central Record

Online safety in schools and colleges

Children and online safety away from school and college

Supporting children not in school or college

Supporting children in school
Peer on Peer Abuse

Key contacts

See section 5 of main policy.

Vulnerable children

Vulnerable children include those who have a social worker (including children in care) and those children and young people up to the age of 25 with education, health and care plans (EHCPs). A child may also be deemed to be vulnerable if they have been assessed (by the Academy, or other professional) as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

Those with an EHC plan will be risk-assessed in consultation with the Local Authority and parents/carers, to decide whether they need to continue to be offered a school or college place in order to meet their needs, or whether they can safely have their needs met at home. This could include, if necessary and available, carers, therapists or clinicians visiting the home to provide any essential services. Many children and young people with EHC plans can safely remain at home.

Eligibility for free school meals in and of itself should not be the determining factor in assessing vulnerability. Senior leaders, especially the Designated Safeguarding Lead (and deputies) know who our most vulnerable children are. Providers are being asked to fund free school meals from their existing funding.

Academy leaders must also consider the health, safety and wellbeing of staff and all other children attending the setting. If a child is unwell or showing the symptoms of Covid -19 (as defined by current government guidelines) they will expect the child to remain at home and the school will offer provision and support remotely informing relevant partner agencies. This will include establishing regular contact with the family until such time as they have adhered to guidelines enabling the now well or symptom free child to return to the Academy.

If the Academy has information that parents/carers are not following current government guidelines Leaders will use their professional discretion, working with any partner agencies and LA officers to agree appropriate action. This will firstly take into account the child's safety however where other exceptional circumstances exist whereby a child compromises the health, wellbeing or safety of staff or other children, then appropriate action will be agreed by the Academy together with the social worker/LA.

The Deaf Academy will continue to work with allocated social workers to help protect vulnerable young people. This includes working with and supporting children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children. If current plans and support packages exist for these students the Academy will continue to provide for these as best as possible in conjunction with the relevant agencies. The lead person for this will be: James Heaver.

There is an expectation that vulnerable children who have a social worker will attend an education setting, so long as they do **not** have underlying health conditions that put them at risk. In circumstances where a parent/carer does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and Academy will explore the reasons

for this directly with the parent/carer. Where parents/carers are concerned about the risk of the child contracting COVID19, the Academy or the social worker will talk through these anxieties with the parent/carer following the advice set out by Public Health England. We will encourage our vulnerable children and young people to attend school, including remotely if not possible by other means.

Critical workers

Although HM Government is clear that children should be at home wherever possible, schools and other educational settings have been asked to provide care for the child/ren of any critical workers who need this support. This may include days and times on which the school would not normally be open, including the school holidays. If the Academy cannot remain open, due to staff illness or self-isolation, or if there is only one child who needs that care, we will notify local authorities and / or the relevant placing authorities who are responsible for arranging for the child/ren to be cared for in an alternative setting that can meet their needs.

The HM Government guidance for educational settings regarding critical workers can be found here <https://www.gov.uk/government/publications/closure-of-educational-settings-information-for-parents-and-carers/closure-of-educational-settings-information-for-parents-and-carers#critical-workers>

Attendance monitoring

Local authorities and education settings do not need to complete their usual day-to-day attendance processes to follow up on non-attendance.

The Deaf Academy and social workers will agree with families whether children in need and those on CP should be attending school – the Deaf Academy will then follow up on any student that they were expecting to attend, who does not. The Deaf Academy will also follow up with any ‘critical worker’ parent or carer who has arranged care for their child(ren) but the child(ren) subsequently do(es) not attend.

To support the above, the Deaf Academy will, when communicating with parents, carers and allocated social workers / placing authorities, confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available.

In all circumstances where a vulnerable child does not take up their place at school, or discontinues, the Deaf Academy will notify their social worker.

If the Deaf Academy has any children in attendance (e.g. because they are vulnerable or the children of critical workers) we will submit the daily attendance sheet to the DfE by 12 noon - <https://www.gov.uk/government/publications/coronavirus-covid-19-attendance-recording-for-educational-settings>

If the school has closed, we will complete the return once as requested by the DfE.

Those vulnerable children who are not attending the Academy will be contacted on a regular basis so that school are satisfied that they are safe. The DSL or Deputy DSLs will review their RAG ratings for this group at least weekly taking into account any reported concerns from Academy contact or any information from partner agencies such as ViST reports. Any changes will be recorded on the school’s/college’s central vulnerable group spreadsheet and shared with the Senior Leadership Team.

Students who are not attending the Academy will be enrolled in the Online Academy. Attendance and wellbeing of these students will be monitored closely and any concerns escalated appropriately.

Online Academy attendance/contact/wellbeing monitoring and escalation process

- Daily registers will be completed for all students following Academy attendance protocol (recorded on SIMS)
- Education staff will record daily visual contact on Teams by the end of PM registration, this will be monitored by the Welfare Team
- Family KIT workers to make contact with family/carers a minimum of every 2 weeks (recorded on Behaviour Watch Covid-19 slips)
- Residential students video-call with keyworker, frequency to be agreed with student (recorded on Behaviour Watch Covid-19 slips)
- Non-residential students video-call with keyworker as required/requested by staff, parents/carers or student (recorded on Behaviour Watch Covid-19 slips)
- Therapies contact with student/families as required (recorded on Behaviour Watch Covid-19 slips)
- Welfare Team to review all student attendance twice weekly at team meeting
- Education staff to update Safeguarding and Attendance teams of any expected students not seen if they later arrive and record on Teams
- In exceptional circumstance where there are no welfare concerns or history of concerns we may create bespoke timetables with parents and carers that do not involve daily eyes on contact. These will at a minimum have eyes on contact Monday, Wednesday and Friday. Any bespoke arrangements will be recorded on Covid-19 Behaviour Watch slips
- Non-attendance will be actioned by following Academy attendance protocol – staff will make reasonable enquiries about the child or young person’s whereabouts. This may include contacting the family, relatives, neighbours, social workers or the student
- If the young person’s wellbeing and whereabouts have not been established by the end of PM registration and all reasonable enquiries have been exhausted a referral should be made to the Welfare Team who will assess the level of concern based on age, vulnerability and known risk factors; refer to the student’s individual Covid-19 risk assessment
- If a student has not been seen (eyes on) for over 24 hours (on Fridays by the end of the school day), even if there has been email, text or phone contact with student or family/carers, referral should be made to the Welfare Team who will assess the level of concern based on age, vulnerability and known risk factors; please refer to the student’s individual Covid-19 risk assessment
- When a concern is identified:
 - Within 24 hours, referral to children or adult social care and/or allocated social worker
 - Within 48 hours, escalation within children or adult social care and referral to EWS (if Devon/under 16)
 - Within 72 hours, report to police via 101 to request a welfare check
 - Within 96 hours, escalate within police force
- If a high level concern is identified:
 - Within 24 hours, report to police via 101 to request a welfare check and referral to children or adult social care and/or allocated social worker
 - Within 48 hours, escalate within police and social care

Designated Safeguarding Lead

The Deaf Academy has a Designated Safeguarding Lead, Deputy Designated Safeguarding Leads and a Welfare Team – these are named on the key personal section of the main policy.

We will endeavour to have a trained DSL, Deputy or member of the Welfare Team available at all times when students are present. This may be via phone or online video - for example, when working from home.

Where a trained DSL or Deputy is not on site, in addition to the above, a senior leader will assume responsibility for co-ordinating safeguarding on site in liaison with the Welfare Team.

The Welfare Team will continue to update and manage access to our safeguarding and child protection online management system, Behaviour Watch, liaising with staff and other members of the Welfare Team, including DSL (or Deputy) and, if required, liaising with student's social workers.

Whatever the scenario, it is important that all the Deaf Academy staff and volunteers have access to a trained DSL or Deputy and the Welfare Team. Staff will be made aware of who is available and how to contact them.

Reporting a concern

Where staff have a concern about a child or young person, they should continue to follow the process outlined in the school safeguarding policy, this includes:

- **Recognising** and being alert to signs and indicators of possible abuse or harm
- **Reporting** to the Welfare Team immediately either by FaceTime, telephone or text (ensuring that the message is received by requesting a return text to confirm receipt). Staff must not just leave an answerphone message.
- **Recording** as directed by the Welfare Team

Staff are reminded of the need to report any concern immediately and without delay.

Where staff are concerned about an adult working with children or vulnerable adults in the Academy, they should report the concern to the Principal immediately. If there is cause to make a notification to the Principal whilst away from the Academy, this should be done by telephone or can be emailed with a text sent to the Principal to alert them of this and to request a return text to confirm receipt. Staff must not just leave an answerphone message. If the Principal is not contactable, the member of staff should contact the Deputy DSL.

Concerns about the Principal should be directed to the Tony Alexander, Chair of Governors.

Safeguarding Training and induction

DSL training is very unlikely to take place during this period.

For the period COVID-19 measures are in place, a DSL (or Deputy) who has been trained will continue to be classed as a trained DSL (or Deputy) even if they miss their refresher training.

All existing Academy staff have had safeguarding training and have read at least part 1 of Keeping Children Safe in Education (2021). The Designated Safeguarding Lead should communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

Where new staff are recruited, or new volunteers enter the Deaf Academy, they will continue to be provided with a safeguarding induction by a member of the Welfare Team, will read at least part 1 of Keeping Children Safe in Education (2021) and will be provided with a copy of the Deaf Academy's Safeguarding and Child Protection Policy. They will also be required to complete Group 2 online safeguarding training prior to commencing their role.

The existing Academy workforce may move between schools on a temporary basis in response to COVID-19. Where the Deaf Academy receive staff from another school, we will judge, on a case-by-case basis, the level of safeguarding induction required. As a minimum, the visiting professional(s) will be provided with a copy of our safeguarding / child protection policy, will be provided with a safeguarding induction by a member of the Welfare Team which will include the names and contact details of safeguarding personnel.

Safer recruitment/volunteers and movement of staff

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the Deaf Academy will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of KCSIE.

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact – see <https://www.gov.uk/government/news/covid-19-changes-to-dbs-id-checking-guidelines>

If staff are deployed from another education or children's workforce setting to our school, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:-

- the individual has been subject to an enhanced DBS and children's barred list check (and / or adult barred list check where relevant)
- there are no known concerns about the individual's suitability to work with children (or adults at risk, where relevant)
- there is no ongoing disciplinary investigation relating to that individual

Where the Deaf Academy are utilising volunteers, we will continue to follow the checking and risk assessment process as set out in paragraphs 167 to 172 of KCSIE. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

The Deaf Academy will continue to comply with the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph 163 of KCSIE.

The Deaf Academy will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's 'Teacher misconduct: advice for making a referral'.

During the COVID-19 period all referrals should be made by emailing Misconduct.Teacher@education.gov.uk.

Whilst acknowledging the challenge of the current environment, it is essential from a safeguarding perspective that any school or college is aware, on any given day, which staff/volunteers will be in the school or college and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, the Deaf Academy will continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE.

Single Central Record

The Single Central Register is held electronically on the shared HR drive, on OneDrive. The HR Manager is responsible for ensuring it is maintained in accordance with statutory requirements and Academy policy.

Online safety in schools and colleges

The Deaf Academy will continue to provide a safe environment, including online. This includes the use of an online monitoring and filtering system.

Where children are using computers in school, appropriate supervision will be in place.

Children and online safety away from school and college

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the child protection policy and where appropriate referrals should still be made to children's social care and as required the police.

Online teaching should follow the same principles as set out in the Academy's disciplinary policy/capability policy.

The Deaf Academy will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Below is the staff and student guidance for video calls and conferencing, this guidance will be circulated to all relevant parties prior to video calls commencing. All parents/carers will be asked for their permission for us to video call with their child/young person:

Video calls and conferencing with students – Staff Guidelines

Why video call/ conference – only these reasons:

Do you really need to call – can you use TEAMS chat or a recorded video from STREAM instead?

1. Welfare check on a student (*Care keyworker/ tutor/ Safeguarding/ KIT only*)
2. Tutor check in with a student (*Tutor*)
3. To clarify work set (*tutor/ subject teacher/ CSW team as allocated by Tim*)
4. To provide feedback on work set (*tutor/ subject teacher/ CSW team as allocated by Tim*)
5. Safeguarding concerns (*Welfare Team*)

****Learning leaders and CSWs may be asked to join in the call as the 3rd person and should also adhere to all the guidance below.***

When video call/ conference?

During normal Academy hours (9am-3.30pm) unless previously agreed by parents/ carers. Note down if this has been agreed when you log the call.

What will you need?

- Ipad, laptop, computer or tablet with internet connectivity and a webcam
- A quiet space with plain background
- Another phone or device to contact Safeguarding if you are concerned about a student.

How to video call?

Do NOT use Facebook, WhatsApp, Facetime, or any other face to face means to contact students.

1. Open Zoom and schedule a Zoom call – do not use TEAMS to call students
2. Copy the invite and invite student and a second staff member via TEAMS individual chat (secure)
3. Always invite another member of staff on a call with you (**see above Lls and CSWs*)
4. When the call starts, ask for a parent/ carer to be present (students under 16) Over 16 years ask student permission to speak to parents/carers first. There will always be 2 staff present on calls to ensure full spoken and signed communication where needed.
5. Remind students of guidelines for video calls – every time! (see student guidelines)
6. Note down date, time and duration of the conversation. Brief description of the call. Keep your own notes on this.

Safety

- If a student is in their bedroom or dressed inappropriately, stop the call and log with Safeguarding
- If a student is in a group call (tutor time/ lesson) and behaves inappropriately, remove them from the call immediately and report this to Safeguarding or your line manager.
- If you are concerned about a student's welfare, text or call a member of the Welfare Team immediately. Invite them onto the call if possible. If it is an emergency contact 999

Guidelines – must be followed

Your background/ location:

- Plain background
- No pictures, objects, personal things or mirrors behind you
- Warn others in your house you will be video calling
- Consider sound do you need it, if not turn it off!

Conduct/ behaviour:

- Be professional – in dress and language
- Agree a time limit i.e. 15-20 min max.
- Do not give out any personal details in a call

Video calls/video conferencing and using STREAM – Student Guidelines

Why will staff video call/ conference with you?

6. Check you are ok – tutor or key worker
7. To explain your work
8. To feedback on your work
9. If they are worried about your safety

When video call/ conference?

Normal Academy hours (9am-3.30pm)

What will you need?

- Ipad, laptop, computer or tablet with internet and a camera
- A quiet space with plain background

How to video call?

Do NOT use Facebook, WhatsApp, Facetime, or any other face to face means to contact staff.

7. Open TEAMS
8. Click on the ZOOM link there
9. Ask a parent or carer to be around – staff will ask to see them
10. Wait to be added to the call
11. Remember the rules!

Rules for Video calls or video conferencing

Your background/ location:

- Not in your bedroom – use living room, kitchen or a public area of your house
- Plain background
- No pictures, objects, personal things or mirrors behind you
- Warn others in your house you will be video calling
- Turn sound off unless you need it

Conduct/ behaviour:

- Dress appropriately – this is Virtual Academy! No PJs or topless.
- Plain tops help clear signing!
- If you are worried you can contact Welfare Team (See Content Library on ONENOTE – “Need Help”)
- Academy rules and behaviour, same as classroom – RESPECT
- Do not give out any personal details in a call
- You are not allowed to share any links to meetings

Any inappropriate behaviour and you will have to leave the call.

Online safety at home

The Academy will continue to support parents/carers, sharing online safety information, websites and resources for them to utilise on the academy website and in academy communications and updates, such as, links to CEOPs, ThinkUKnow.

Supporting children not in school or college

The Deaf Academy is committed to ensuring the safety and wellbeing of all its students.

The Designated Safeguarding Lead will ensure that a robust communication plan is in place for each child, their parent(s) / carers and the allocated social worker or placing authority.

Details of this communication plan must be recorded on, as should a record of any contact made.

The communication plan may include; remote contact, phone contact, door-step visits. Other individualised contact methods should be considered and recorded.

The Deaf Academy and its Designated Safeguarding Lead will work closely with all stakeholders to maximise the effectiveness of any communication plan.

This plan must be reviewed regularly and where concerns arise, the Designated Safeguarding Lead will consider any referrals as appropriate, taking into account the local criteria for action.

In addition, the school will share safeguarding messages on its website and social media pages.

The Deaf Academy recognises that school is a protective factor for children and young people, and the current circumstances have a significant potential to affect the mental health of students and their parents/carers. Teachers and pastoral staff at the Academy will be aware of this in setting expectations of students' work where they are at home.

The Deaf Academy will ensure that if we are unable to care for the child/ren of critical workers, residential students and vulnerable children on site, we will liaise with the placing local authority and the parent / carer to find a suitable alternative; e.g, at a 'hub' school or via a multi-disciplinary package of support. In that situation, the DSL will ensure that the DSL of the hub school / lead practitioner is made aware of any relevant safeguarding information relating to a child.

The Principal will ensure that appropriate staff are on site and staff to student ratio numbers are appropriate, to maximise safety. The Deaf Academy will continually refer to the most recent Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID19. Where staff have concerns about the impact of staff absence – such as our Designated Safeguarding Lead or first aiders – they will discuss them immediately with senior leaders.

Supporting children in school

The Deaf Academy is committed to ensuring the safety and wellbeing of all its students.

The Deaf Academy will continue to be a safe space for all children to attend and flourish. The Headteacher will ensure that appropriate staff are on site and staff to student ratio numbers are appropriate, maximising safety.

The Deaf Academy will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of coronavirus.

The Deaf Academy will ensure that where we care for children of critical workers, residential students and vulnerable children on site, we will ensure appropriate support is in place for them. This will be bespoke to each child and recorded appropriately.

Peer on peer abuse

The Deaf Academy recognises that during the closure a revised process may be required for managing any report of such abuse and supporting victims.

Where the Academy receives a report of peer on peer abuse, they will follow the principles as set out in part 5 of KCSIE and of those outlined within the Academy's safeguarding & child protection policy.

The Academy will listen carefully, and work with the young person, family and any multi-agency partner required to ensure the safety and security of that young person.

All concerns and actions taken must be reported to the Welfare Team, will be recorded on Behaviour Watch and appropriate referrals made.