Young Adult Safeguarding Policy

Policy Control Page

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Date	Version	Person	Change / Action
08/08/23	V1	LH	Creation of separate young adults and adults at risk safeguarding
29/07/24	V2	LH	Updated to reflect changes in KCSiE 2024 where relevant to adults
28/07/24	V3	LH	Updated to reflect changes in KCSiE 2025 where relevant to adults
24/09/25	V4	LH SR	• Updated 'KCSiE 2024' to '2025' • Changed the language from 'gender questioning' to 'questioning their gender'. • Changed 'Google Bard' to 'Google Gemini' • Added 'medical policies' to 'links with other policies' • Added recommended paragraph about Artificial Intelligence • Changed 'autism spectrum disorder' to 'autism' • Added detail to RSHE in 'roles and responsibilities' • Added 'misinformation, disinformation (including fake news), conspiracy theories' to 4 key categories of online of risk • Updated for change of Safeguarding Link Trustee • Updated for Board of Trustees details and responsibilities

11/09/26	V5	LH	Updated to reflect KCSIE 2026 where relevant to adults; clarified the boundary between child and adult safeguarding; aligned the Care Act section 42 threshold, mental capacity, consent, information sharing and student-on-student abuse terminology; and updated the legislative framework.

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1. Safeguarding statement:

The Care Act statutory guidance defines adult safeguarding as "*Protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse and neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances*".

We endeavour to provide a safe and welcoming environment where all young adults are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that all young adults receive effective support, protection and justice. Safeguarding and promoting our student's welfare is integral to our values and purpose as an organisation:

- We demonstrate our **care** and **commitment** for our young adults through our willingness to advocate their rights and recognise and respond to abuse or neglect wherever it may occur.
- 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 our young adults 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 young adults and adults at risk who are Deaf are at an increased risk of abuse and harm and that they may have difficulties in communicating their concerns. We understand risk is further increased due to societal attitudes and assumptions or protection procedures which fail to acknowledge young adults' 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 young adults across the Academy, whatever their background or circumstances.

2. Who this document applies to

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 agree to work to our child and adult safeguarding policies. They are issued with the Academy's Young Adults and Adults at Risk Safeguarding policy, Child Protection and Safeguarding policy and Keeping Children Safe in Education (KCSiE) 2026 Part One.

They are required to provide a signature as part of their induction to confirm that they have read, understood and agree to work to these documents. This applies to the Governing Body and Board of Trustees in relation to part 2 of the same guidance (KCSiE).

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 young 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 capacity of the young adult.

KCSiE 2026 applies to children and young people under the age of 18. Where a concern involves a student aged 18 or over, the Academy will apply the Care Act 2014, the Mental Capacity Act 2005 and relevant adult safeguarding procedures. Where an incident involves both a child and an adult, the Academy will apply the appropriate child and adult safeguarding frameworks concurrently and coordinate referrals between the relevant agencies.

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 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 child or young adult.

Everyone who comes into contact with the Academy, including students, has the right to be treated fairly, with dignity and respect. Safeguarding concerns and allegations will be managed confidentially, proportionately and without prejudging their outcome, while the welfare and safety of children and adults at risk remain the primary consideration.

3. The Academy will support all young adults by:

- Promoting a caring, safe, and positive environment.
- Encouraging a culture of ensuring that young adults' voices are heard, and their wishes and feelings are taken into account.
- Promoting a culture where young adults know that their concerns will be treated seriously, and where 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 young adult 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 young adults 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/professionals, 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 young adults to understand safeguarding, including online safety, and manage risk through both our curriculum and all aspects of Academy life.
- Ensuring that young adults 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.

4. Policy Principles

The Academy is committed to the protection and safeguarding of all young adults and adults at risk in its care, and our students' welfare will always be our top priority.

Governors and Trustees take their responsibilities to safeguard and promote the welfare of young adults and adults at risk seriously and work with other agencies to ensure that appropriate arrangements are in place to identify, assess and support adults who are experiencing or are at risk of abuse or neglect, including those who may be unable to protect themselves because of their care and support needs.

This Policy has been established in accordance with the Care Act 2014 including the six key principles that underpin adult safeguarding:

- **Empowerment:** People being supported and encouraged to make their own decisions and informed consent.
- **Prevention:** It is better to take action before harm occurs.
- **Proportionality:** Proportionate and least intrusive response appropriate to the risk presented.
- **Protection:** Support and representation for those in greatest need.
- **Partnership:** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability:** Accountability and transparency in safeguarding practice.

Positive Risk Taking

The Academy recognises that young adults have the right to make decisions about their own lives, including decisions others may regard as unwise, where they have capacity to make those decisions. Staff will support positive risk taking whilst taking proportionate action to prevent abuse, neglect and exploitation.

Professional Curiosity

Staff will maintain professional curiosity and respectfully explore concerns where information presented does not fully explain known risks, vulnerabilities or indicators of abuse.

The Academy recognises that all staff, Trustees, Governors, parents/carers, visitors and volunteers have a full and active part to play in protecting children and young adults at risk from harm, and that our students' welfare is of paramount concern.

The Academy will:

- Act in accordance with the young adult's rights, wishes, feelings and wellbeing, and make decisions in their best interests only where they lack capacity for the specific decision.
- Listen to any communication from young adults or parents/carers and always take concerns seriously.
- Ensure that all young adults regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.
- Recognise that all staff, including temporary staff, volunteers, Governors and Trustees, 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 young adult is at risk of harm.

- Ensure that 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 student.
- Ensure that staff involved in safeguarding 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.

4a. Mental Capacity, Consent and Best Interests

The Academy recognises that students aged 18 and over have the right to make their own decisions and to live as independently as possible. Safeguarding practice must balance an individual's right to make choices with the need to protect them from abuse, neglect and exploitation.

The Academy will work in accordance with the principles of the Mental Capacity Act 2005:

- Every young adult will be presumed to have capacity unless it is established otherwise.
- All reasonable support will be provided to help individuals make their own decisions.
- A person will not be treated as lacking capacity simply because they make an unwise decision.
- Any decision made on behalf of a person who lacks capacity must be made in their best interests.
- Any action taken must be the least restrictive option available.
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Mental capacity is decision-specific and may fluctuate over time. A young adult may have capacity to make some decisions but not others. Deafness, autism, learning disabilities, communication differences or mental health needs do not automatically mean a person lacks capacity.

The Academy adopts a person-centred approach to safeguarding and will normally seek the young adult's consent before sharing information or making referrals. However, information may be shared without consent where there is a risk of serious harm, abuse, neglect, exploitation, coercion, criminal activity, a public protection concern, or where the individual lacks capacity in relation to the decision.

Where a young adult is assessed as lacking capacity for a specific decision, the Academy will work with relevant professionals, family members, advocates and others involved in their care to ensure decisions are made in the person's best interests. Wherever possible, the young adult's wishes, feelings, beliefs and values will remain central to decision-making.

The Academy also recognises that some young adults may have capacity but continue to require support to understand risk, maintain safe relationships, manage finances, use technology safely and recognise exploitation. In these circumstances staff will promote independence whilst taking proportionate action to reduce safeguarding risks.

Any decisions relating to capacity, consent, information sharing or best interests will be appropriately recorded.

5. 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 the welfare of young adults.
- To raise the awareness of all staff of the need to safeguard young adults and of their responsibilities in identifying and reporting possible cases of abuse, both on and off campus.

- Staff are properly trained in recognising and reporting safeguarding issues.
- That we have an established and 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 to students, parents/carers and other partners.
- To support young adults development in ways that will foster security, confidence and independence.
- To provide an environment in which young adults feel safe, secure, valued, believed and respected and feel confident to, and know how to access support if they are in difficulty.
- That we follow a person-centred approach focussing on the care and wishes of the individual, ensuring that their preferences, needs and values guide decisions and actions taken on their behalf.
- To provide a systematic means of monitoring adults at risk 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, external agencies and parents/carers, always taking into account the feelings and wishes of our young adults in relation to information sharing.
- To develop and promote effective working relationships with other agencies, especially the police, and social care.
- To ensure that all staff working within our Academy 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.
- To ensure ongoing support for an adult at risk when transitioning from the Academy through appropriate and proportionate information sharing with involved professionals.

6. 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 & CEO** — sdewing@thedeafacademy.ac.uk, 01395 203132 / 07814 680090
- 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 / 07362 730299
- Natasha Young — nyoung@thedeafacademy.ac.uk, 07588 494956
- Cris Sherratt — csherratt@thedeafacademy.ac.uk, 07450 469891
- Olivia Hills — ohills@thedeafacademy.ac.uk, 07398 249173 (text only)

Rolle House Childrens Home Designated Safeguarding Lead (DSL):

- James Heaver - **Assistant Principal for Care** jheaver@thedeafacademy.ac.uk
  01395 203180 / 07763 625110

Designated teacher for Looked after children

- Rachel Stevens – **Head of School** rstevens@thedeafacademy.ac.uk

Welfare Team: safeguardingteam@thedeafacademy.ac.uk

Out of hours contact number: 07763 625110

Nominated safeguarding and child protection link Trustee/Governor:

- Bob Spencer bspencer@thedeafacademy.ac.uk

(Alternatively, contact the Academy reception on 01395 203130, who will then contact Bob Spencer on your behalf)

Chair of the Governing Body and Chair of the Board of Trustees:

- Chair of the Governing Body -Tony Alexander chair@thedeafacademy.ac.uk
- Chair of the Board of Trustees – Dame Angela Pedder apedder@thedeafacademy.ac.uk

(Alternatively contact the Academy reception on 01395 203130, who will then contact Tony Alexander or Dame Angela Pedder on your behalf)

7. Legislation and statutory guidance

The following legislation and guidance have 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.

- The Care Act 2014 establishes the legal framework for adult care and support in England. Section 42 requires a local authority to make, or cause to be made, enquiries where it has reasonable cause to suspect that an adult has needs for care and support, is experiencing or is at risk of abuse or neglect, and, as a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it.
- 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.
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR).
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting students (where we can show it's proportionate). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- Charity Commission safeguarding guidance
- **Mental Capacity Act 2005 Code of Practice.** The Academy will apply the Mental Capacity Act 2005 and the current Code of Practice when supporting decision-making, assessing capacity, making best-interests decisions and considering whether arrangements may amount to a deprivation of liberty. The Deprivation of Liberty Safeguards remain relevant to hospitals and care homes; where a potential deprivation of liberty arises in another setting, legal advice and, where required, authorisation from the Court of Protection must be considered.
- The policy also takes account of the Mental Capacity Act 2005 and its Code of Practice; the Data Protection Act 2018 and UK GDPR; the Domestic Abuse Act 2021 and associated statutory guidance; the Modern Slavery Act 2015; the Human Rights Act 1998; and the Equality Act 2010. These provisions inform decision-making about capacity, consent, information sharing, domestic abuse, exploitation, trafficking, proportionality, equality and the protection of individual rights.
- This policy also complies with our funding agreement and articles of association.

8. Definitions

Safeguarding and promoting the welfare of young adults and adults at risk means protecting those at risk of maltreatment, preventing impairment of mental and physical health, ensuring that young adults and adults at risk live in circumstances consistent with the provision of safe and effective care, taking action to enable them to have the best outcomes and protecting their right to live in safety, free from abuse and neglect.

Children all young people under the age of 18.

Adult at Risk means a person aged 18 or over who has needs for care and support, whether or not the local authority is meeting any of those needs; is experiencing, or is at risk of, abuse or neglect; and, as a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it.

Young Adult adults aged between 18 and 25. For the purposes of this policy we will use the term 'young adult' to refer to all Academy students over the age of 18, inclusive of those who may be classified as 'adults at risk'.

Abuse is an intentional or unintentional act that harms, hurts or exploits another individual/s. Abuse can take many forms, but no type of abuse is acceptable.

Neglect is the ongoing failure to meet an individual's basic and essential needs, either deliberately, or by failing to understand these. It includes ignoring a person's needs, or withholding essentials to meet needs, such as medication, food, water, shelter or warmth.

Staff for the purposes of this policy 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. It includes all staff, teachers, supply teachers, Governors and Trustees.

DoLS (Deprivation of Liberty Safeguards) the framework of safeguards under the Mental Capacity Act 2005 for people who need to be deprived of their liberty in a hospital or care home in their best interests for care or treatment if mental capacity to consent is lacked. If a person is in another setting deprivation of their liberty can only be authorised by the Court of Protection.

Student-on-student abuse refers to abuse between students. Where all those involved are aged 18 or over, adult safeguarding law and procedures apply. Where any person involved is under 18, the Academy will also apply its Child Protection and Safeguarding Policy and the child-on-child abuse provisions of Keeping Children Safe in Education 2026. Abuse between an adult and a child must never be treated solely as peer abuse.

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

The 3 Safeguarding partners local authority, police and health.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the young adult involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of young adults as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

9. Equality statement

Some young adults 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 adults' diverse circumstances. We ensure that all young adults have the same protection, regardless of any barriers they may face.

Adults at risk, with care and support needs, such as people with disabilities, are more likely to be abused or neglected. They may be seen as an easy target and may be less likely to identify abuse themselves or to report it. Adults with communication difficulties can be particularly at risk because they may not be able to alert others. Sometimes young adults may not even be aware that they are being abused, and this is especially likely if they have a cognitive impairment. Abusers may try to prevent access to the person they abuse.

We give special consideration to young adults who:

- Have special educational needs (SEN), disabilities or certain health conditions.
- Have intimate care needs.
- Are bereaved.
- Are showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime.
- Are frequently missing/go missing from education, care or home.
- 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 or domestic violence or where there is a family member in prison.
- Are at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Are viewing problematic and/or inappropriate online content (for example, linked to violence), or developing unsafe relationships online.
- Are misusing drugs or alcohol.
- Are at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage.
- Have a parent or carer in custody or is affected by parental offending.
- Are missing education, or persistently absent from college, or work placements.
- Have experienced multiple suspensions and are at risk of, or have been permanently excluded.
- 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 previously looked after.

- Are vulnerable to exploitation due to difficulties with executive functioning, social communication, understanding risk, recognising coercion, managing finances or maintaining safe relationships.

10. Confidentiality and information sharing

- We recognise that young adults have the right to be involved in decisions about when and how information about them is shared, including with parents, carers and external agencies. Consent will normally be sought. However, information may be shared without consent where there is another lawful and proportionate basis, including a risk of serious harm, abuse, neglect or exploitation; suspected criminal activity; coercion or undue influence; a public protection concern; or where the young adult lacks capacity in relation to the decision and sharing is in their best interests. Wherever it is safe and practicable to do so, the Academy will explain what information will be shared, with whom and why, and will record the decision and rationale.
- 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 adults at risk.
- 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.
- The Academy will contribute to inter-agency working 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 adults at risk and the Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping adults at risk 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 young person 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 vulnerable adult at risk.
- If a victim asks the academy not to tell anyone about sexual violence or sexual harassment:
    - There is no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children and young adults.
- The DSL should consider that:
    - The DSL should consider that consent should normally be sought before sharing information with parents or carers or making a referral concerning an adult. However, consent is not required where there is another lawful basis for sharing, including where the adult or another person is at risk of serious harm, abuse or neglect; a crime has been or may be committed; coercion or undue influence affects the adult's decision; the adult lacks capacity in relation to the decision and sharing is in their best interests; or sharing is necessary to protect the public. The decision and rationale must be recorded.
    - Where there is reasonable cause to suspect that an adult has needs for care and support, is experiencing or is at risk of abuse or neglect, and, as a result of those needs, is unable to protect themselves, a safeguarding concern should be raised promptly with the

relevant local authority. Consent should normally be sought, but must not delay or prevent action where there is another lawful basis for sharing. Immediate danger or suspected criminal activity must be reported to the police or emergency services without delay.

    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, young adults should be supported to refer to the police in line with their feelings and wishes.
- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
    - Do all they reasonably can to protect the anonymity of any children and young adults involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for those involved.
    - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' and alleged perpetrators' identities.
- 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 & CE, members of the Welfare Team, Link Safeguarding Trustee or the Chair of the Governing Body/Chair of the Board of Trustees. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.
- We recognise that all matters relating to safeguarding are personal to young adults and families. Therefore, in this respect they are confidential, and the Principal & CEO or DSLs will only disclose information to other members of staff on a need-to-know basis.
- If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or deputies).
- 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 and information sharing is also addressed with respect to record-keeping in Appendix 9, and allegations of abuse against staff in (Appendix 6 of the Academy's Child Protection and Safeguarding policy)

11. Notifying parents/carers

Where appropriate and with consent, we will discuss concerns about a young adult with their parents/carers, unless there is reason to believe this would increase the risk to the young person. 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.

In the case of allegations of abuse made against other students, we will normally notify the parents/carers of all involved (with consent for all those over 18). We will think carefully about what information we provide about other students involved, and when. We will work with the police and/or local authority social care to make sure our approach to information sharing is consistent.

The young adult's consent will normally be sought before information is shared with parents, carers or external agencies. If consent is withheld, information will only be shared where there is a lawful and proportionate basis to do so, including a risk of serious harm, abuse or neglect; a public protection concern; suspected criminal activity; coercion or undue influence; or where the young adult lacks capacity in relation to the decision and sharing is in their best interests. Wherever it is safe and practicable to do so, the young adult will be told what information will be shared, with whom and why. The decision and rationale will be recorded.

If agreement is made to share information with parents/carers the DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Contact the victim's parents or carers, to discuss what is being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed.
- Contact the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s).

12. Roles and responsibilities

Safeguarding is **everyone's** responsibility. This policy applies to all staff, volunteers, Trustees and Governors in the Academy. Adult safeguarding practice will be consistent with the Care Act 2014, relevant local Safeguarding Adults Board procedures and local multi-agency arrangements. Where a concern involves a child, the Academy will also follow the procedures of the three safeguarding partners and its Child Protection and Safeguarding Policy. Our procedures apply to Academy, extended Academy and off-site activities.

The Academy plays a crucial role in preventative education. This is in the context of a whole-Academy approach to preparing students for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

The Academy acknowledges the Government's Violence Against Women and Girls strategy and recognises that safeguarding systems, curriculum delivery and behaviour expectations should address harmful attitudes, misogyny, online abuse, image-based abuse, coercive control and sexual harassment. This will be underpinned by our:

- Behaviour policy.
- Pastoral support system.

- Planned programme of relationships, sex and health education (RSHE), which is inclusive, takes student's stages of development into account and is delivered regularly, tackling issues such as:
  - Healthy and respectful relationships, supporting children to develop skills that form the building blocks of all positive relationships.
  - Kindness in relationships.
  - Boundaries and consent.
  - Stereotyping, prejudice and equality.
  - Body confidence and self-esteem.
  - How to recognise an abusive relationship (including coercive and controlling behaviour), and how to report concerns.
  - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support.
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable, emphasizing that the victims of sexual harassment or abuse are never at fault for it.

All staff

All staff will:

- Read, understand and agree to work to the Academy's safeguarding policies and procedures and provide a signature at induction to this effect. They will also read and understand Part One of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and will review this guidance at least annually and at the time of employment, again providing a signature to confirm this.
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask students to do online (e.g., sites they need to visit or who they'll be interacting with online).
- Provide a safe space for students who are LGBT to speak out and share their concerns. Understand the risks associated with artificial intelligence, deepfake technology, nudification applications and AI-generated sexual imagery and report concerns in line with Academy safeguarding procedures.

All staff will be aware of:

- Although KCSIE 2026 applies directly to students under 18, its strengthened expectations remain relevant where risks cross age boundaries or affect the wider Academy community. Staff should be alert to overlapping safeguarding concerns including modern slavery, financial exploitation, child-to-parent or carer abuse, misogyny and incel-related ideology, risks associated with generative artificial intelligence, multiple mobile phones, medical conditions, mental health needs, sport and extracurricular activity, and abuse occurring across home, education, residential, community and online contexts.
- Their responsibilities to safeguard and promote the welfare of young adults and adults at risk.
- What to do if they identify a safeguarding issue or a student 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 adult or adult at risk is at immediate risk reporting to the police, ambulance service or adult services.
- How to respond to a young adult who discloses abuse.

- Our systems which support safeguarding, including the child protection and safeguarding policy, this safeguarding young adults and adults at risk policy, the staff code of conduct], the role and identity of the designated safeguarding lead (DSL) and [deputy/deputies] and the behaviour policy, E-safety policy.
- The process for making referrals to local adult's social care/care direct.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that young adults can be at risk of harm inside and outside of their home, at college and online.
- The fact that young adults who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by others.
- What to look for to identify young adults who need help or protection.
- All staff should take care not to place themselves in a vulnerable position with a young adult.
- 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 safeguarding. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep students safe online. The role of DSL is explicit in the role holder's job description. The DSL is also responsible for ensuring the Young Adults and Adults at Risk Safeguarding 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 number: **07763 625110**
- Team email; safeguardingteam@thedeafacademy.ac.uk

When the DSL is absent, the deputies 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 Safeguarding Leads, 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 and safeguarding policy, Young Adults and Adults at Risk Safeguarding policy, staff code of conduct and Keeping Children Safe in Education Part One.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of young adults.

- Refer suspected cases, as appropriate, to the relevant body (adult's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviours.
- Have a good understanding of the filtering and monitoring systems and processes in place at the Academy
- Ensure the effectiveness of filtering and monitoring systems is reviewed and documented at least annually and reported to Governing Body/Finance and Resources Committee.
- Refresh knowledge and skills at regular intervals (at least annually) and receive appropriate training every two years by undertaking multi-agency training including the Protection of Vulnerable Adults, MCA and DoLS.
- Ensure staff understand the relationship between safeguarding, capacity, consent and best interest decision making.
- 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 young adults/adults at risk in Devon.
- Keep the Principal & CEO informed of any issues and report termly to Governing Body/Care and Safeguarding Committee.
- Discuss the local response to sexual violence and sexual harassment with police and local authority to prepare the academy's policies.
- Be confident that they know what local specialist support is available to support all young people/adults involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Ensure the Academy maintains procedures for responding to incidents involving artificial intelligence, including AI-generated sexual imagery, deepfakes, image-based abuse, impersonation and online exploitation.

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 Board of Trustees and Governing Body

The Board of Trustees will:

- Approve the safeguarding policies on annual basis.
- Delegate responsibility for the operation and monitoring of safeguarding at the Academy to the Governing Body and the Care and Safeguarding Committee.
- Receive regular reports from the Governing Body and the Care and Safeguarding Committee
- Nominate a safeguarding and child protection Link Trustee or Governor to monitor the effectiveness of this policy in conjunction with the Governing Body, Care and Safeguarding Committee and the Board of Trustees. This is always a different person from the DSL.

The Governing Body 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.
- The Chair of the Care and Safeguarding Committee and Safeguarding Link Trustee will approve this policy at each review, ensure it complies with the law and hold the Principal & CEO to account for its implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our Academy's local multi-agency safeguarding arrangements.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated (at least annually) and is in line with advice from the safeguarding partners
- Ensure that the Academy has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
    - Online safety is a running and interrelated theme within the whole-academy approach to safeguarding and related policies.
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
    - The Academy has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
    - That this policy reflects that young adults with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.

- Where another body is providing services or activities on campus (regardless of whether or not the young adults who attend these services/activities are on the Academy roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed.
    - Make sure there are arrangements for the body to liaise with the Academy about safeguarding arrangements, where appropriate.
    - Make sure that safeguarding requirements are a condition for using the academy premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
    - The Academy remains responsible for safeguarding and promoting the welfare of children placed within alternative provision and will seek assurance regarding safeguarding arrangements and information sharing.

- The Chair of the Governing Body/Chair of the Board of Trustees will act as the 'case manager' in the event that an allegation of abuse is made against the Principal & CE, where appropriate.
- At least one member of the Governing Body and on member of the Board of Trustees will have completed safer recruitment training, to be repeated every five years.
- Enhanced DBS checks (without barred list checks, unless the Governor or Trustee is also a volunteer at the Academy) are in place for all Governors and Trustees. 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 & CEO

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

- Ensuring that staff:
    - 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 adult 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, including online safety training, and update the content of this training annually.
- 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.
- Ensuring the relevant staffing ratios are met, where applicable.
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.

13. Recognising abuse

Staff, volunteers, Trustees 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 adult 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 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.
    - Staff should **record** full and accurate details of any concerns raised, as directed by the DSL, at the earliest opportunity.
    - Safeguarding and Welfare leads will complete a signs of safety assessment for all concerns raised and will agree any necessary actions and referrals.
    - If the concern relates to a member of staff, it should be **reported** immediately to the Principal & CE.
    - If the concern relates to the Principal & CEO, it should be **reported** to the Chair of the Governing Body/Chair of the Board of Trustees.
- Where there is reasonable cause to suspect that an adult has needs for care and support, is experiencing or is at risk of abuse or neglect, and, as a result of those needs, is unable to protect themselves, a safeguarding concern should be raised promptly with the relevant local authority. Consent should normally be sought, but lack of consent must not delay action where the adult or another person is at immediate or serious risk, where coercion or undue influence is suspected, where a crime may have been committed, where the adult lacks capacity in relation to the

decision, or where there is an overriding public interest. The police or emergency services must be contacted immediately where there is immediate danger or suspected criminal activity. Anyone can raise a safeguarding concern.
- Tell the DSL as soon as possible if you make a referral directly.
- When referring concerns consider what is known about the young adult's wider context (contextual safeguarding).

Managing disclosures

If a young adult 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 adult's own words. Stick to the facts, and do not make your own judgement on it then pass it on to the DSL.
- Where appropriate, make a referral directly to adult social care and/or the police and inform the DSL as soon as possible. Consent should normally be sought, but lack of consent must not delay action where there is immediate or serious risk, suspected abuse or neglect, coercion or undue influence, suspected criminal activity, a public protection concern, or where the adult lacks capacity in relation to the decision.
- 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.

Bear in mind that some young adults may:
- Not feel ready or know how to tell someone that they are being abused, exploited or neglected.
- Not recognise their experiences as harmful.
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a young adult.

Female genital mutilation (FGM)

Female Genital Mutilation (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. 'Known' cases are those where either a girl informs the person that an act of FGM – however described – has been carried out on her, or where the person observes physical signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation within section 1(2)(a) or (b) of the FGM Act 20032.

FGM is usually carried out on girls between 5 and 8 years old. However, it can also be carried out on younger or older girls and adult women.

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, should speak to the DSL immediately and follow Academy safeguarding procedures.

If you have concerns about a young adult (as opposed to believing they are suffering or likely to suffer from harm, or are in immediate danger)
Concerns about a young adult or adult at risk 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 Care Direct or other support is appropriate.

Concerns about extremism
If a young adult 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 adult's social care. Make a referral directly and with consent (exclusions apply), 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 the police or Channel, the government's programme for identifying and supporting individuals at risk of being involved with or supporting terrorism, or the local authority adult's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which Academy 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

Academy staff should be alert to indicators that a young adult may be experiencing mental health difficulties, including:

- significant and sustained changes in behaviour;
- social withdrawal;
- ongoing difficulties sleeping;
- sudden decline in engagement or performance;
- self-harm;
- suicidal thoughts or disclosures;
- neglect of personal care;
- unexplained emotional distress.
- Staff should recognise that mental health concerns may be indicators that a young adult has experienced abuse, neglect, exploitation or trauma.

Where a young adult presents an immediate risk to themselves or others, emergency services should be contacted without delay, alongside informing the DSL.

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

14. Allegations of abuse made against other students (student-on-student abuse)

We recognise that students are capable of abusing other students. Abuse will never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up', as this can lead to a culture of unacceptable behaviour and an unsafe environment. Where all students involved are aged 18 or over, adult safeguarding procedures apply. Where any student involved is under 18, the Academy will also apply its Child Protection and Safeguarding Policy and the child-on-child abuse provisions of Keeping Children Safe in Education 2026.

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 our safeguarding policies 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; young adults 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, up skirting (typically involves taking a picture under a person's clothing without them knowing; this is now a criminal offence) or sexually extreme/illegal pictures or videos (including non-consensual sharing of nudes or semi-nudes).
- Involves sexual violence.

Procedures for dealing with allegations of student-on-student abuse
If a student 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 students involved (including alleged victims, the student against whom the allegation has been made and any others affected), to include a named person they can talk to if needed. This assessment will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
- The DSL will contact (exclusions apply), the local authority adult's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- 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.
- The Academy will consider issues of capacity, power imbalance, coercion, dependency, communication needs and vulnerability when assessing incidents involving peer-on-peer abuse.
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting students and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment 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.
- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including non-consensual sharing or sending of 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 male students.
- Ensure our curriculum helps to educate young people about appropriate behaviour and consent.
- Ensure young adults are able to easily and confidently report abuse.
- Ensure staff reassure victims that they are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support young adults who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra familial harm and any necessary support for siblings following a report of sexual violence and/or harassment.
- 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 adult at risk'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:
    - Adults at risk 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.
    - An adult at risk's behaviour might indicate that something is wrong.
- That certain young adults may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
- That a young adult harming a peer could be a sign that the young adult 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 young adult may be at risk from it.
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g., by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our Academy from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA adult's social care to determine this.
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

Sexual violence and harassment

Sexual violence and sexual harassment can occur:

- Between young adults of any age and sex.
- Through a group of young adults sexually assaulting or sexually harassing a single young adult or group of young adults.
- Online and face to face (both physically and verbally).

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

Young adults 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 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 any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law is there to protect them, not criminalise them.
- Regularly review decisions and actions, and update policies with lessons learnt.
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns.
- Consider if there are wider cultural issues within the Academy that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again.
- Remain alert to the possible challenges of detecting signs that a young person has experienced sexual violence and show sensitivity to their needs.

Some groups are potentially more at risk. Evidence shows that girls, young adults with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) young people 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 young adult makes a report to them, they will follow the procedures set out in this policy.

15. Reporting systems for our young adults

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

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

To achieve this, we will:

- Put systems in place for young adults 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 our students.
- Make it clear to young adults that their concerns will be taken seriously, and that they can safely express their views and give feedback.

Early help

Early help assessments can be used to support children and young people between 0-19, including unborn babies. It can also be used up to the age of 25 where a young person has special educational needs or disabilities (SEND).

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.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the Academy will consider a referral to local authority adult'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 adult's social care team or the police, the DSL/Welfare Team will usually 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.

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 adult's social care. Share details of any actions you take with the DSL as soon as practically possible).

Whenever possible (with consent) we will inform families and/or young adults 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 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 adult'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 young adult's situation improves (see appendix 5 of the Academy's Child Protection and Safeguarding policy)

Concerns about a staff member

If you have concerns about a member of staff (including supply staff, Governors, Trustees or volunteers), or an allegation is made about a member of staff posing a risk of harm to students, speak to the Principal & CEO as soon as possible. If the concerns/allegations are about the Principal & CEO speak to the Chair of the Governing Body or Chair of the Board of Trustees.

The Principal & CEO, Chair of Governing Body or Chair of the Board of Trustees will then follow the procedures set out in appendix 6 of the Academy's Child Protection and Safeguarding policy, if appropriate.

Where appropriate, the Academy will inform Ofsted of the allegation and actions taken, within the necessary timescale.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Principal & CEO, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for students, follow our Academy safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

16. 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 and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

We recognise that students with SEND or certain health conditions can face additional safeguarding challenges. Young adults with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the adult at risk's disability without further exploration.
- Being more prone to peer group isolation or bullying (including prejudice-based bullying) than other young adults.
- The potential for students with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

As all students at the Academy have EHC plans/SEND, any abuse involving our students will require close liaison with the DSL. We will be alert to the extra vulnerabilities our students may face due to the residential nature of our setting.

17. Students with a social worker

Students may need a social worker due to safeguarding or welfare needs. We recognise that a young adult'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 young adults.

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.

18. Previously looked-after children/care leavers

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 and care leavers safe. In particular, we will ensure that:

- Appropriate staff have relevant information about young people's looked after legal status, contact arrangements with birth parents and care arrangements.
- The DSL has details of social workers and professionals involved.
- We have appointed a designated teacher, who is responsible for promoting the educational achievement of looked-after children, previously looked-after children and care leavers in line with statutory guidance.
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

19. Students who are lesbian, gay, bisexual or questioning their gender

We recognise that students who are (or who are perceived to be) lesbian, gay, bisexual or questioning their gender (LGBTQ+) can be targeted by other children.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for students who are questioning their gender, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a student who is questioning their gender, we will take a cautious approach as there are still unknowns around the impact of social transition, and a student may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the student). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where students lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where students can speak out or share their concerns with members of staff.

Decisions relating to social transition, use of facilities, residential arrangements, safeguarding plans or requests regarding names and pronouns will be considered individually using documented risk assessments and, where appropriate, in partnership with the young adult, family members and relevant professionals.

20. Online safety and the use of mobile technology

We recognise the importance of safeguarding young adults 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 (including filtering and monitoring systems) in place to ensure the online safety of students, staff, volunteers, Governors and Trustees.
- Protect and educate the whole Academy 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.

21. Online Safety

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 extreme/illegal pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, misinformation, disinformation (including fake news), conspiracy theories, 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 for sexual, criminal, financial, romance scams, online extortion, 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., non-consensual sharing of nudes and semi-nudes and/or extreme/illegal pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, cryptocurrency scams, online fraud, banking exploitation, money mule activity, phishing and/or financial scams.

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

Educate young adults 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 students 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, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. . 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' meetings. We will also share clear procedures with them so they will know how to raise concerns about online safety.

- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras as set out in the staff code of conduct.
- Make all students, staff, volunteers, trustees 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 student is in breach of our policies on the acceptable use of the internet and mobile phones.
- Put in place robust filtering and monitoring systems to limit young people's exposure to the 4 key categories of risk (described above) from the Academy's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child and adult and safeguarding policies, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

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.

Artificial intelligence (AI)

The Deaf Academy recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard students. students

Students, staff, volunteers, Governors and Trustees should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. The Academy's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

Artificial intelligence (AI) technologies are increasingly accessible to children and adults. They may present safeguarding risks including:

- creation of deepfake or manipulated images;
- AI-generated sexual imagery;
- nudification applications;
- online grooming;
- financial exploitation;
- catfishing;
- romance fraud;
- bullying and harassment;
- impersonation;
- online abuse;
- misinformation and disinformation.
- The Academy will treat AI-enabled abuse using the same safeguarding principles applied to child-on-child abuse, sexual harassment, online abuse and exploitation.

Any AI-generated sexual image of a child will be treated as a safeguarding concern and managed in line with statutory guidance, police advice and UKCIS guidance.

22. Searching, Screening and Confiscation

All students have the right to expect a reasonable level of personal privacy. Searching can play a critical role in ensuring that schools and colleges are safe environments for students and staff.

Only the Principal & CEO or staff they authorise may search a student or their possessions where there are reasonable grounds to suspect that the student may have a prohibited item (refer to the Academy's behaviour policy), searches should be for specific items.

Academy staff have the power to search a student for any item if the student agrees. The authorised member of staff should assess how urgent the need for a search is.

- Explain to the student why they are being searched, how and where it will take place and give them the opportunity to ask any questions. Staff should ensure the student understands the reason for the search and how it will be conducted so that their agreement is informed. When exercising their powers, the Academy must consider the age and needs of students being searched or screened, making reasonable adjustments. Refusal to co-operate/agree to a search may result in sanctions in line with the Academy's behaviour policy
- Where there are concerns regarding capacity to give informed consent, decision making will be guided by the Mental Capacity Act 2005 and best interest principles where applicable.
- An appropriate location for the search should be found, where possible away from other students. Searches should only be conducted on Academy grounds or where staff have lawful charge of the student
- The member of staff conducting the search must be of the same sex as the student being searched. There must be another staff member present to witness
- Staff may search a student's outer clothing, pockets, possessions, desks or lockers. The person conducting the search must not require the student to remove clothing other than outer clothing
- A student's possessions can only be searched in their presence, except where there is a risk of serious harm if the search is not conducted immediately
- Staff may use a metal detector to assist with the search
- The DSL should be informed of all searches conducted and full details should be recorded on CPOMS
- Parents/carers of students under the age of 18 should be informed of any search, wherever possible they should be informed prior to the search. Permission from students over the age of 18 will be sought in relation to informing parents/carers and all decisions will be made in line with the young person's best interests
- The Academy may at times require students to undergo screening via a hand-held metal detector. The Academy will always request consent from students and/or parent/carer 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 (or permission is not given by parent/carer), we reserve the right to refuse them access to the campus.
- If during a search objects or materials are found of an illegal or dangerous nature the police will be informed.
- There are limited exceptions to the above guidance. Staff should refer to DfE's guidance on searching, screening and confiscation for further information

The Principal & CEO should oversee the Academy's practice of searching to ensure that a culture of safe, proportionate and appropriate searching is maintained, which safeguards the welfare of all students and staff with support from the DSL.

23. 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 30 days and then recorded over unless there is a clear purpose for retaining footage for a longer period. 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.

24. Whistleblowing

We recognise that young adults 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. Staff should follow guidance in the Academy's Whistleblowing Policy (provided to staff at time of induction and available on the Academy website).

Whistleblowing in relation to the Principal & CEO should be made to the Chair of the Governing Body or Chair of the Board of Trustees whose contact details are readily available to staff.

25. Record-keeping

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

Safeguarding records relating to allegations involving AI-generated content, deepfakes, image-based abuse or digitally manipulated media will be retained and managed in accordance with child protection recording procedures.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded. This should include instances where referrals were or were not made to another agency such as local authority social care or the Prevent programme, etc. 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 safeguarding file for each student.

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 young people will be retained for a reasonable period after they have left the Academy.

If a young adult whom the Academy has, or has had, safeguarding concerns moves to another education provision, the DSL will ensure that their safeguarding file is forwarded promptly and securely, and separately from the main student file.

To allow the new college to have support in place when the student arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term.

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 college and provide information to enable them to have time to make any necessary preparations to ensure the safety of the young adult.

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

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

26. Training

All staff

- All staff receive safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the Academy's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect in line with advice from Devon Children & Families' Partnership which is updated annually. Staff will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings).
- All new staff complete relevant safeguarding e-learning 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 full induction 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.
- All staff will receive regular safeguarding updates relevant to their role at least once a year. This will be delivered through CPD sessions, staff meetings, e-bulletins, emails, e-learning, or formal refresher courses.
- Enhanced safeguarding training will be regularly updated (at least annually) 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 include online safety, including an understanding of the expectations, roles and responsibilities of staff around filtering and monitoring.
- 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 young people.
- Training on online safety will be integrated with the whole Academy approach to safeguarding.
- 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 student facing staff are unable to attend this training 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.
- Safeguarding and Child Protection Policies are available via the Academy website and parents/carers are made aware of these policies, their entitlement to have a copy via the website and the responsibilities of staff members with regard to safeguarding and child protection procedures.
- The name of the Designated Safeguarding Lead and Deputies and wider Welfare Team are clearly advertised in the Academy, alongside contact details for making referrals internally and externally.
- As part of their enhanced safeguarding training, staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children and young adults at risk of being involved with or supporting 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 and Trustees

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

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
- Can be assured that safeguarding policies and procedures are effective and support the Academy to deliver a robust whole-academy approach to safeguarding.

As the Chair of the Governing Body or Chair of the Board of Trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal & CEO, 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. The Academy will ensure safer recruitment practice reflects current regulated activity requirements and any amendments introduced by the Crime and Policing Act 2026. 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. Online searches will be undertaken on shortlisted candidates as part of the safer recruitment process.

28. Monitoring arrangements

The effectiveness of this policy in keeping young adults and adults at risk safe is monitored primarily by the Care and Safeguarding Committee that reports into the Governing Body and Board of Trustees. 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.

29. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff Code of Conduct
- Child Protection and Safeguarding
- Bruising or Injuries Assessment and Procedure
- Whistleblowing
- Anti-bullying
- Teaching and learning
- Administration of medicines
- Lanyard protocol
- RSHE
- Appropriate touch
- Physical intervention
- E-safety, including staff use of mobile phones
- Social media policy
- Risk assessment
- Recruitment and selection and recruitment of ex-offenders
- 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
- Medical policies

Appendix 1


the Deaf Academy
Inspiring education
Welfare Team
Safeguarding, Welfare and Advice
Are you worried about your safety or the safety of a friend?
The Deaf Academy staff are here to help. Below are the Welfare Team, but you can talk to any member of staff if you feel worried.
Email us: safeguardingteam@thedeafacademy.ac.uk
Out of hours: Contact James Heaver
Safeguarding Leads
James Heaver
Designated Safeguarding Lead
jheaver@thedeafacademy.ac.uk
07763 625110
Louise Hammacott
Deputy Designated Safeguarding Lead
lhammacott@thedeafacademy.ac.uk
07880 590246
Wider Welfare Team
Sylvan Dewing
Principal and Deputy Designated Safeguarding Lead
sdewing@thedeafacademy.ac.uk
07814 680090
Bob Spencer
Trustee Lead responsible for Safeguarding and LAC
bspencer@thedeafacademy.ac.uk
07730 926882
Welfare Officers
Natasha Young
Head of Care
nyoung@thedeafacademy.ac.uk
07588 494956
Kate Whitney-Morris
SEMH Lead
kwhitneymorris@thedeafacademy.ac.uk
07387 021651
Olivia Hills
Deputy Manager in Residential Care
ohills@thedeafacademy.ac.uk
07398 249173 (text only)
Devina Jhundoo-Clayton
SEMH Lead
djhundooclayton@thedeafacademy.ac.uk
07362 730299
Cris Sherratt
Registered Manager Adult Residential Learning Centre
csherratt@thedeafacademy.ac.uk
07450 469891
If you think you are not being treated right you can also contact:
Children's Commissioner
Help at Hand
help.team@childrenscommissioner.gsi.gov.uk
childrenscommissioner.gov.uk/ask-question
childline
Childline
childline.org.uk/get-support
Police non-emergency
Phone: 101 | Text phone: 18001 101
Devon Safeguarding Adults Partnership
Care Direct
customer.relations@devon.gov.uk

Appendix 2

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*** • 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*** • 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)**

Appendix 3

Safeguarding our students

Worried that a child or adult is at risk of harm or abuse?



Recognise

Recognise and be alert to the signs and indicators of possible abuse or harm
*Where you have received a disclosure offer reassurance that what they have shared is important and we take it seriously

Report

Report all safeguarding concerns immediately to safeguarding/welfare leads
Facetime, Zoom, face-to-face (do not just leave a voicemail or record on handovers/CPOMS

Record

Safeguarding/welfare leads will tell you where to **Record** details of you concern and will support you to do this

If you need immediate support call 111 from any landline to alert SLT/Welfare team
For Deaf staff call 111 and do not replace receiver

If you are not satisfied with the Academy's Safeguarding response to your concern 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
POLICE non-emergency 101 emergency 999
*Please note some 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@thedeafaacademy.ac.uk

Appendix 4

Bruising and Injuries

Assessment and Procedure

Created: June 2020
Completed by: James Heaver Assistant Principal & CE of Care
Date reviewed: April 2025 (update)

Spotting the signs of abuse is not always easy. In some cases, professionals may be unable to see past an adult at risk's impairment to recognise the signs of abuse. An adult at risk 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 the young adult'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 young adult. Bruising on an adult at risk 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 young adult's medical and social history, developmental stage and explanation given. Any adult at risk who has unexplained signs of pain or illness should be seen promptly by a doctor.

What do we know about bruising?
• Bruising is strongly related to mobility.
• Once children are mobile they sustain bruises from everyday activities and accidents.
• Children and vulnerable adults who are able to walk independently may have bruises.
• Bruises usually happen when someone falls over or bumps into objects in their way.
• Children have more bruises during the summer months.

Where would you expect to see bruising from an accidental injury?
• The shins and knees are the most likely places where children and young people who are walking/starting to walk/have challenges with mobility, 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 metaphyseal fractures, without any bruising.
• Accidental bruising in children and young people with a disability is related to the their 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 the commonest site of bruising in child abuse. Other common sites include the ear and neck.
• As a result of defending themselves, abused children and vulnerable adults 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 and vulnerable adults. 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 those 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 or vulnerable adult has been "scalped" – ie, had their hair pulled violently.

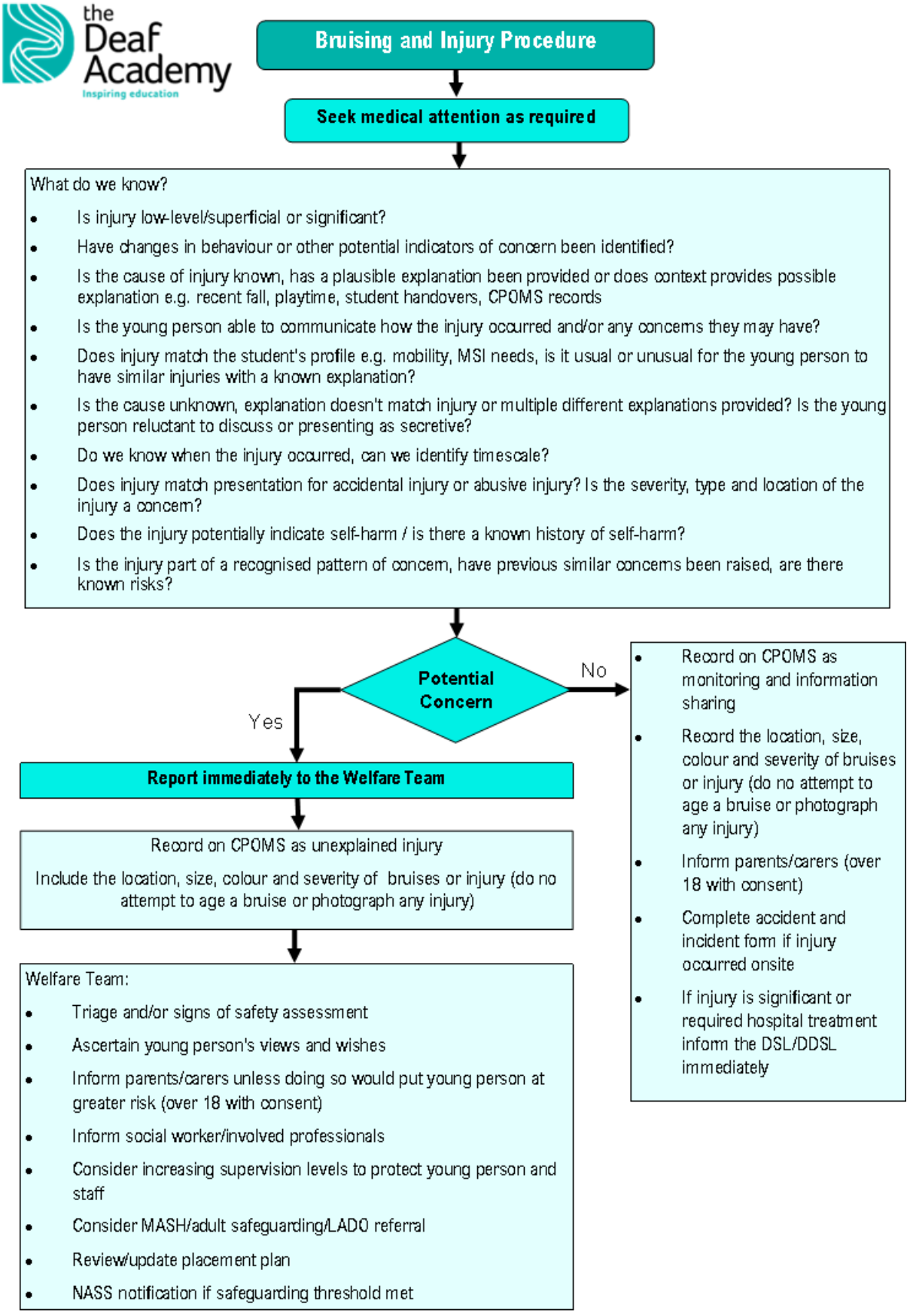
Can you age a bruise accurately?
The answer is no. Estimates of the age of a bruise are currently based on an assessment of the colour of the bruise with the naked eye. The accuracy of observers who estimate the age of a bruise visually is no better than 50 per cent. The evidence is that we cannot accurately age a bruise from an assessment of colour – from either a clinical assessment or a photograph. A practitioner who offers a definitive estimate of the age of a bruise in a child by assessment with the naked eye is doing so from their own experience without adequate published evidence.

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

Bruising that suggests the possibility of physical abuse includes:
- bruising in those who are not independently mobile
- bruises that are seen away from bony prominences
- bruises to the face, back, abdomen, arms, buttocks, ears and hands
- multiple bruises in clusters
- multiple bruises of uniform shape
- bruises that carry an imprint – of an implement or cord
- bruises with petechiae (dots of blood under the skin) around them

Immediate actions:
- Seek appropriate medical attention if required (Academy nurse, walk-in centre, doctor, 999)
- Complete initial assessment of level of concern, "What do we know?"
- If injury is significant or concern level high report immediately to the Welfare Team and do not speak to parents/carers as this may put the young person at further risk of harm

Please speak to the Welfare Team if you are unsure or if you require any support to assess a bruise or injury.


Bruising and Injury Procedure
Seek medical attention as required
What do we know?
Is injury low-level/superficial or significant?
Have changes in behaviour or other potential indicators of concern been identified?
Is the cause of injury known, has a plausible explanation been provided or does context provides possible explanation e.g. recent fall, playtime, student handovers, CPOMS records
Is the young person able to communicate how the injury occurred and/or any concerns they may have?
Does injury match the student's profile e.g. mobility, MSI needs, is it usual or unusual for the young person to have similar injuries with a known explanation?
Is the cause unknown, explanation doesn't match injury or multiple different explanations provided? Is the young person reluctant to discuss or presenting as secretive?
Do we know when the injury occurred, can we identify timescale?
Does injury match presentation for accidental injury or abusive injury? Is the severity, type and location of the injury a concern?
Does the injury potentially indicate self-harm / is there a known history of self-harm?
Is the injury part of a recognised pattern of concern, have previous similar concerns been raised, are there known risks?
Potential Concern
No
Record on CPOMS as monitoring and information sharing
Record the location, size, colour and severity of bruises or injury (do no attempt to age a bruise or photograph any injury)
Inform parents/carers (over 18 with consent)
Complete accident and incident form if injury occurred onsite
If injury is significant or required hospital treatment inform the DSL/DDSL immediately
Yes
Report immediately to the Welfare Team
Record on CPOMS as unexplained injury
Include the location, size, colour and severity of bruises or injury (do no attempt to age a bruise or photograph any injury)
Welfare Team:
Triage and/or signs of safety assessment
Ascertain young person's views and wishes
Inform parents/carers unless doing so would put young person at greater risk (over 18 with consent)
Inform social worker/involved professionals
Consider increasing supervision levels to protect young person and staff
Consider MASH/adult safeguarding/LADO referral
Review/update placement plan
NASS notification if safeguarding threshold met

Appendix 5

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, this includes ensuring that they have a current DBS certificate. 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.

Appendix 6

Non-collection of students

If a non-independent student is not collected as expected at the end of the session/day, we will:

- Wait with the student 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 student 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 7
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.
- Problematic or harmful sexual behaviour.

Risk indicators:

The factors described in this section are frequently found in cases of 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 Adult's Services.

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

- Appear frightened of their peers/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 health promotion services and treatment of the adult at risk's episodic illnesses.
- Have unrealistic expectations.
- Frequently complain about/to the adult at risk and may fail to provide attention or praise (high criticism/low warmth environment).
- Be absent or misuse substances.
- Persistently refuse to allow access on home visits.
- Be involved in domestic abuse.

Staff should be aware of the potential risk to young adults when individuals, previously known or suspected to have abused, 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 young adults outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether young adults are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and young adults can be vulnerable to multiple

harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. 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

- Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing.
- Rough handling
- Scalding and burning
- Physical punishments
- Inappropriate or unlawful use of restraint
- Making someone purposefully uncomfortable (e.g., opening a window and removing blankets)
- Involuntary isolation or confinement
- Misuse of medication (e.g., over-sedation)
- Forcible feeding or withholding food.
- Unauthorised restraint, restricting movement (e.g., tying someone to a chair)

Domestic violence or abuse

Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Young adults can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a young adult 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, relationship abuse (abuse in intimate personal relationships between young people/young adults) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on vulnerable adults of all forms of domestic abuse, including where they see, hear or experience its effects. 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.

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. Young adults who witness domestic abuse are also victims.

Young adults may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on young adults and affect their health, wellbeing, development and ability to learn.

Mate Crime

Mate crime occurs when a person befriends an adult at risk for the purpose of exploitation, abuse, financial gain, criminal activity, sexual exploitation, access to accommodation or other personal benefit.

Sexual abuse

- Rape attempted rape or sexual assault.
- Inappropriate touch anywhere.
- Non- consensual masturbation of either or both persons.
- Non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth.
- Any sexual activity that the person lacks the capacity to consent to.
- Inappropriate looking, sexual teasing or innuendo or sexual harassment.
- Non-consensual sexual photography or forced use of pornography or witnessing of sexual acts.
- Indecent exposure.

Sexual abuse by young adults

The boundary between what is abusive and what is part of normal 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 young adults 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.

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 young adult. 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 an adult at risk 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 adults 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:

- **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 young adults, the above information should be used only as a guide.

Psychological or emotional abuse

- Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends.
- Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance.
- Preventing someone from meeting their religious and cultural needs.
- Preventing the expression of choice and opinion.
- Failure to respect privacy.
- Preventing stimulation, meaningful occupation or activities.
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse.
- Addressing a person in a patronising or infantilising way.
- Threats of harm or abandonment.
- Cyber bullying.

Financial or material abuse

- Theft of money or possessions.
- Fraud, scamming.
- Preventing a person from accessing their own money, benefits or assets.
- Taking a loan from a person.
- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions.
- Arranging less care than is needed to save money.
- Denying assistance to manage/monitor financial affairs.
- Denying assistance to access benefits.
- Misuse of personal allowance.
- Misuse of benefits or direct payments in a family home.
- Someone moving into a person's home and living rent free without agreement or under duress.
- False representation, using another person's bank account, cards or documents.
- Exploitation of a person's money or assets.
- Misuse of a power of attorney, deputy, appointeeship or other legal authority.
- Rogue trading – e.g., unnecessary or overpriced services and failure to carry out agreed repairs or services.
- online scams
- romance scams
- banking abuse
- misuse of benefits
- coercive financial control
- identity theft
- cryptocurrency fraud
- pressure to become a money mule

Modern Slavery

- Human trafficking.

- Forced labour.
- Domestic servitude.
- Sexual exploitation, such as escort work, prostitution and pornography.
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to.

Increased awareness and reporting help 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. 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 to leave the exploitative situation and the perpetrators have still committed a crime. Vulnerable adults may not be able to give informed consent and therefore exploitation even without any element of coercion could constitute modern slavery.

Discriminatory abuse

- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as **'protected characteristics' under the Equality Act 2010**).
- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic.
- Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader.
- Harassment or deliberate exclusion on the grounds of a protected characteristic.
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic.
- Substandard service provision relating to a protected characteristic.

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.

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 adults with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of abuse.

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

The subject of bullying is addressed at regular intervals in the Academy's PSHE curriculum.

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

We acknowledge that repeated incidents or a single serious incident may lead to consideration under safeguarding 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.

Organisational or institutional 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 could also occur in a residential care or supported living provisions. 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:

- Discouraging visits or the involvement of relatives or friends.
- Run-down or overcrowded establishment.
- Authoritarian management or rigid regimes.
- Lack of leadership and supervision.
- Insufficient staff or high turnover resulting in poor quality care.
- Abusive and disrespectful attitudes towards people using the service.
- Inappropriate use of restraints.
- Lack of respect for dignity and privacy.
- Managing residents with abusive behaviour.
- Not providing adequate food and drink, or assistance with eating.
- Not offering choice or promoting independence.
- Misuse of medication.
- Failure to provide care with dentures, spectacles or hearing aids.
- Not taking account of individuals' cultural, religious or ethnic needs.
- Failure to respond to abuse appropriately.
- Interference with personal correspondence or communication.
- Failure to respond to complaints.
- Rigid routines or processes organised to meet staff needs rather than the individuals.
- A culture of abusive behaviour or tolerance of abusive behaviour

Neglects and acts of omission

- Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care.
- Providing care in a way that the person dislikes.
- Failure to administer medication as prescribed.
- Refusal of access to visitors.
- Not taking account of individuals' cultural, religious or ethnic needs.
- Not taking account of educational, social and recreational needs.
- Ignoring or isolating the person.
- Preventing the person from making their own decisions.
- Preventing access to glasses, hearing aids, dentures, etc.
- Failure to ensure privacy and dignity.

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 self-harm.
- Failure to seek help or access services to meet health and social care needs.
- Inability or unwillingness to manage one's personal affairs.
- Refusal of necessary support.
- Obsessive hoarding.

Young adults who are absent from education

A young adult being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a young adult may be ab sent from education, but some are particularly at risk. These include young adults at risk 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 education.
- Come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with adults at risk who are absent 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.

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 student'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 adults at risk are absent on repeat occasions from the Academy.

We recognise the need for heightened awareness where an adult at risk 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.

County Lines

Criminal exploitation of children/young adults 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 adults 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.

Cuckooing

Cuckooing is a form of criminal exploitation where offenders take over the home of a vulnerable person in order to facilitate criminal activity such as drug dealing, storing weapons or exploitation of others.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a 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).

Online safety

Some adults and children use technology to harm others. Harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children and adults at risk to engage in sexual behaviour such as webcam photography or face-to-face meetings. Students 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 support students to be 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.

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 of a person legitimising support for, or use of, terrorist violence

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

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 involved with or supporting 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/vulnerable adults at risk.

We will assess the risk of students in our academy being involved with or supporting 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.

Children and young adults 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.

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 young person 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 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'.

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, should speak to the DSL and follow Academy safeguarding procedures.

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children and young people 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.

FGM is usually carried out on girls between 5 and 8 years old. However, it can also be carried out on younger or older girls and adult women. The procedure tends to be carried out by a woman who has no medical training, although in some instances it may be carried out by health professionals.

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.
Further information about FGM can be found in the Academy's Child Protection and Safeguarding policy.

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 young people from forced marriage.

The Forced Marriage Unit (FMU) has created multi-agency practice guidelines 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 young adults abuse other young adults within their peer group. This type of abuse can take place inside and outside of college. It can also take place both face-to-face and online and can occur simultaneously between the two.

Our Academy has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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 young adults (this is sometimes known as 'teenage relationship abuse').
- 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.
- Non-consensual sharing of nudes and semi nudes images and/or videos.
- Up skirting, 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 young adults 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.

When considering instances of harmful sexual behaviour between young adults, we will consider their ages and stages of development. We recognise that young adults displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

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 young adults 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 young people/vulnerable adults have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Serious violence

Indicators which may signal that a young adult is at risk from, or involved with, serious violent crime are as 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 student being involved in, or at risk of, serious violence, they will report this to the DSL.

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.

Appendix 8 – Local contacts

Police

Non-emergency 101
Emergency 999

Early Help

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

Early help assessment can be used to support children and young people between 0-19 years, including unborn babies and can also be used up to the age of 25 where a young person has special educational needs or disabilities (SEND).

Torbay and Devon Safeguarding Adults Partnership

Care Direct 0345 1551 007
Emergency Duty Service 0345 6000 388
csc.caredirect@devon.gov.uk
Devon MyLife - Form Runner

Appendix 9

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 10

Safeguarding escalation procedure

Please refer to the Academy's Child Protection and Safeguarding policy Appendix 5

Appendix 11

Managing allegations against staff policy and procedure

Please refer to the Academy's Child Protection and Safeguarding policy Appendix 6