Safeguarding and Child Protection 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 2026 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
Sep 26	V5	LH	September 2026: Updated safeguarding terminology and statutory guidance references; clarified Family Help, safer recruitment checks, allegation procedures, online safety, alternative provision, restrictive intervention, and low-level concerns.

Contents

PART A

1. Safeguarding statement Page 5
2. Who this document applies to Page 5
3. Policy Principles Page 6
4. Policy aims Page 7
5. Key personnel Page 7
6. Legislation and statutory guidance Page 8
7. Definitions Page 10
8. Equality statement Page 11
9. Roles and responsibilities Page 12
    - All staff Page 12
    - The Designated Safeguarding Lead (DSL) Page 13
    - Deputy Designated Safeguarding Leads (DDSL) Page 15
    - The Board of Trustees and Governing Body Page 15
    - The Principal & CEO Page 16
    - Virtual School Heads Page 17
10. Confidentiality and information sharing Page 17
11. Recognising abuse Page 18
    - Suffering or likely to suffer harm, or in immediate danger Page 18
    - Managing disclosures Page 19
    - Female genital mutilation (FGM) Page 20
    - If you have concerns about a child Page 20
    - Early help Page 20
    - Referral Page 20
    - Concerns about extremism Page 21
    - Mental health concerns Page 21
    - Concerns about a staff member Page 23
    - Allegations of abuse made against other children (child-on-child abuse) Page 23
    - Procedures for dealing with allegations of child-on-child abuse Page 23
    - Minimising the risk of child-on-child abuse Page 24
    - Sexual violence and harassment Page 25
    - Youth produced sexual imagery (sharing nudes and semi-nudes) Page 25
12. Notifying parents/carers Page 29
13. Children with special educational needs, disabilities or health issues Page 30
14. Children with a social worker Page 30
15. Looked-after and previously looked-after children Page 30
16. Students who are lesbian, gay, bisexual or questioning their gender Page 31

17. Online safety and the use of mobile technology Page 31
18. Searching, screening and Confiscation Page 33
19. Whistle-blowing Page 34
20. Record keeping Page 35
21. Surveillance and monitoring Page 36
22. Training Page 36
- All staff Page 36
- DSL and deputies Page 37
- Trustees and Governors Page 37
- Recruitment – interview panels Page 37

23. Monitoring arrangements Page 38
24. Links with other policies Page 38

PART B

Procedures for child-on-child allegations

The Academy follows current statutory safeguarding guidance and its established procedures for this area, including prompt recording, risk assessment, appropriate referral or consultation, information sharing, support, oversight, and review.

Appendix 1 – Initial safeguarding response to allegations: Page 39
- Actions where there are concerns about a child (KCSIE 2026KCSIE 2026) Page 39
- Welfare Team poster Page 40
- Signs of safety assessment and planning form Page 41
- Safeguarding procedure poster Page 42
- Initial safeguarding response to allegations Page 43

In the initial safeguarding response, staff record facts and the person's own words, secure immediate safety, preserve evidence and contact the case manager/LADO. Staff must not determine credibility, test the account or conduct an investigation.

- Bruises or injuries assessment and procedure Page 45
- Checking the identity and suitability of visitors Page 48
- Non-collection of children Page 48

Appendix 2 – Types and indicators of abuse Page 49
- Signs and indicators of abuse Page 49
- Types of abuse Page 50
- Physical abuse Page 50
- Emotional abuse Page 50
- Sexual abuse Page 50
- Neglect Page 51
- Self-neglect Page 52
- Bullying including cyberbullying Page 52
- Racist incidents/homophobic/trans-phobic/language/equality act 2010 Page 52
- Child criminal exploitation Page 52
- Children who are absent from education Page 53

- Child sexual exploitation Page 54
- County lines Page 55
- Domestic abuse Page 56
- Homelessness Page 56
- Modern slavery Page 58
- Online safety Page 58
- Online Abuse Page 58
- Preventing radicalisation Page 59
- Private fostering Page 60
- So-called 'honour-based abuse (including FGM and forced marriage) Page 61
- Child-on-child abuse Page 63
- Serious youth violence Page 64
- Serious violence Page 64
- Organisational abuse Page 64
- Stalking Page 64
- Discriminatory abuse Page 65
- Hate crime Page 65
- Financial abuse Page 65

Appendix 3 – Local contacts Page 66

Appendix 4 – The seven golden rules to sharing information Page 67

Appendix 5 – Safeguarding escalation procedure Page 68

Appendix 6 – Managing allegations against staff policy and procedure Page 71

Part A

1. Safeguarding statement:

"Children have the right to be protected from all forms of violence (physical and mental). They must be kept safe from harm and they must be given proper care by those looking after them."
United Nations Convention on the Rights of the Child, Article 19

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

- We demonstrate our **care** and **commitment** for children through our willingness to advocate their rights, recognise abuse or neglect wherever it may occur and to **communicate** these to the team around the child.
- We recognise the impact of discrimination and added vulnerability this may cause, so work to an ethos of **respect** and dignity.
- We set high safeguarding **standards**, in the knowledge that children 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 children who are Deaf are at an increased risk of abuse and harm and that they may have difficulties in communicating concerns to adults. We understand risk is further increased due to societal attitudes and assumptions or child protection procedures which fail to acknowledge young people's diverse circumstances, rather than the individual personality, impairment, or circumstance. We are aware of these difficulties and seek to promote a culture of accessible, open communication so that concerns can easily be raised. It is our objective to safeguard all students across the Academy, whatever their background or circumstances. Child protection forms part of the Academy's safeguarding responsibilities.

2. Who this document applies to

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 2026 Part One. All staff, including those who do not work directly with children, are required to read and understand 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 children, 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 age and capacity of the child.

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

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

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

The Academy will support all children by:

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

3. Policy Principles

- We always act with the best interests of the child at heart
- We listen to any communication from children or parents/carers and always take concerns seriously
- All children regardless of age, gender, culture, language, race ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities
- We recognise that all adults, including temporary staff, volunteers, and Governors, have a full and active part to play in protecting our students from harm and all share responsibility to act on any concern that may suggest a child is at risk of harm
- All staff believe that our Academy should provide a caring, positive, safe, and stimulating environment that promotes the social, physical and moral development of every child

- Staff involved in child protection issues will receive appropriate support and supervision as part of the ongoing appraisal and supervision process and also as need arises through peer supervision and de-briefs

4. Policy aims

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

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

5. Key personnel:

Designated Safeguarding Lead (DSL):

James Heaver - Assistant Principal, Care & Safeguarding 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 Children's Home Designated Safeguarding Lead (DSL):

- James Heaver - Assistant Principal, Care & Safeguarding — 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 numbers: 07763 625110

Nominated safeguarding and child protection 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 Governing Body/Chair of the Board of Trustees:

- Tony Alexander/Dame Angela Pedder
  chair@thedeafacademy.ac.uk/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)

6. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2025)Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2023), and the Governance Handbook. This policy also reflects the Families First Partnership Programme and the development of Family Help arrangements, which replace previous Family Help terminology in national safeguarding guidance where applicable. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

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.
- For governors and trustees, enhanced DBS checks and section 128 checks are completed as applicable. Children's barred-list checks are completed only where the individual undertakes regulated activity and the check is legally available.
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of students at the school
- Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015, which places a duty on non-maintained special schools to safeguard and promote the welfare of students at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- 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

  The Academy is committed to an inclusive, anti-discriminatory culture. Staff proactively identify, record on CPOMS and respond to prejudice-based harm, including racism, ableism, religious prejudice, homophobia, biphobia, transphobia, sexism, misogyny and misandry. Reporting is accessible and adapted to communication needs, including for Deaf children, and patterns and

barriers to disclosure are reviewed across safeguarding, pastoral, curriculum and behaviour information.
- Charity Commission safeguarding guidance
  Current Mental Capacity Act and DoLS arrangements are followed pending commencement of the Liberty Protection Safeguards, with legal guidance checked at the time.
- This policy also complies with our funding agreement and articles of association.

7. Definitions

Safeguarding and promoting the welfare of children means:
- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enables all children to have the best outcomes

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

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

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

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

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

Young people includes children and young adults

Young adult includes all students over the age of 18

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

Child-on-child abuse refers to abuse between children under the age of 18

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

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA

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

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 child 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 children) 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.

8. Equality statement

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

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

- Have special educational needs (SEN), disabilities or certain health conditions
- Have intimate care needs
- Are young carers
- 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
- 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 inappropriate 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
- Are privately fostered
- Have a parent or carer in custody or is affected by parental offending
- Are missing education, or persistently absent from school, or not in receipt of full-time education
- 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 looked after or previously looked after
- Whose parents/carers have expressed an intention to home educate

9. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, Trustees and Governors in the Academy and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended Academy and off-site activities.
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, transphobia 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 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.
  - Any other trait not in the above list that might constitute a special consideration.

All staff

All staff will:

- Read and understand Part One of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually and at the time of employment.
- Provide a signature at the beginning of each academic year to say that they have reviewed the guidance. This applies to the Governing body in relation to part 2 of the same guidance.
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children 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 accordance with safeguarding procedures.

All staff will be aware of:

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

The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is James Heaver. The DSL takes lead responsibility for child protection and wider safeguarding. 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 Child Protection and Safeguarding policy remains up to date.

The Academy operates a mobile-phone-free approach during the education day, cross-referenced to the Behaviour Policy and Online Safety Policy. Proportionate documented exceptions may be agreed for medical needs, disability, communication, safeguarding or agreed educational purposes. AI, deepfakes,

nudification and AI-generated sexual imagery are safeguarding concerns managed under child-on-child abuse and image-sharing procedures. Trustees and Governors provide strategic oversight of filtering and monitoring, senior leadership has operational responsibility, the DSL provides safeguarding input and IT implements technical controls. Effectiveness is reviewed and documented at least annually and after significant change or incident.

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

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

- Provide advice and support to the whole Academy on student welfare, child protection and safeguarding matters
- Ensure staff compliance with Academy safeguarding procedures, to include clear identification of DSL/DDSL's, 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 children and young people
- Refer suspected cases, as appropriate, to the relevant body (local authority children's/adult's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- 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 Trustees and Governors.
- Refresh knowledge and skills at regular intervals (at least annually) and receive appropriate training every two years
- Ensure that detailed, accurate records are kept, of all concerns even if there is no need to make an immediate referral
- Ensure that safeguarding records are stored confidentially and retained in line with current GDPR / Academy retention guidelines
- Have an understanding of locally agreed processes for providing family help and intervention and will support members of staff where Family Help is appropriate
- Have a working knowledge of safeguarding arrangements for children and young people in Devon
- Keep the Principal & CEO informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate

- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the Academy's policies
- Be confident that they know what local specialist support is available to support all involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- 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
- Receive regular reports from the Governing Body and 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 and the Board of Trustees. This is always a different person from the DSL.

The Governing Board will:

- Facilitate a whole-Academy approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensure it complies with the law and hold the Principal & CE 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 school'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-school 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 children and young people 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 (regardless of whether or not the children and young people 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 of using the school 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 or the Chair of the Board of Trustees or will act as the 'case manager' in the event that an allegation of abuse is made against the Principal & CEO, where appropriate (see appendix 6).

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

At least one member of the Governing Body and Board of Trustees will have completed safer recruitment training, to be repeated every five years.

For Governors and Trustees, enhanced DBS checks and section 128 checks are completed as applicable. Children's barred-list checks are completed only where the individual undertakes regulated activity and the check is legally available.

The Principal & CEO

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

- Ensuring that staff (including temporary staff) volunteers, Governors and Trustees:
    - Are informed of our systems which support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

- Communicating this policy to parents/carers when their child 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 updating 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 (see appendix 6)
- 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

Virtual school heads

- Virtual School Heads have a statutory responsibility for promoting the educational achievement of looked-after children and previously looked-after children and a non-statutory responsibility for strategic oversight of children with a social worker and children in kinship care. Academy staff will work collaboratively with Virtual School Heads where appropriate.

10. Confidentiality and information sharing

- Timely information sharing is essential to effective safeguarding
- Information sharing should be with the right people between and within agencies
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- 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 in line with 'Working Together to Safeguard Children (2023)' and share information between professionals and agencies where there are concerns
- Staff have a professional responsibility to share information with other agencies in order to safeguard children and the Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- The DPA/GDPR (Data Protection Act/General Data Protection Regulation) does not prevent the Academy from withholding education data where doing so would be in the interests of a child in a refuge
- Staff should also have regard to DfE Data Protection Guidance for Schools when sharing personal information for safeguarding purposes.
- 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 at risk
- 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 children
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - There's 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 people
- The DSL should consider that:
    - Parents or carers should normally be informed* (unless this would put the victim at greater risk.
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- 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 people 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' identities
- Child protection and safeguarding issues warrant a high level of confidentiality, not only out of respect for the student and staff involved but also to ensure that information being released into the public domain does not compromise evidence
- Staff should only discuss concerns with the DSL, Principal & CE, members of the Welfare Team or Chair of Governors. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis
- We will always undertake to share our intention to refer a child to MASH with their parents/carers unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with an external agency
- We recognise that all matters relating to child protection and safeguarding are personal to young people and families. Therefore, in this respect they are confidential, and the Principal & CE 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)
- Following a number of cases where senior leaders in schools failed to act upon concerns raised by staff; 'Keeping Children Safe in Education (2026)' emphasises that any member of staff can contact children's social care if they are concerned about a child.
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' (Appendix 4) for sharing information, and will support staff who have to make decisions about sharing information
- Confidentiality is also addressed in this policy with respect to record-keeping in section 19, and allegations of abuse against staff in appendix 6

11. 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 person is suffering or likely to suffer harm, or is in immediate danger:

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

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

Managing disclosures

If a child 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
- Write up your conversation as soon as possible in the young person's own words. Stick to the facts, and do not put your own judgement on it then pass it on to the DSL
- Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so.
- Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children 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 child.

Female genital mutilation (FGM)

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

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 2.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **student under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

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

Any member of staff who suspects a child 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.

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

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

Family Help

If family 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 a family 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 children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

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

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

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

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

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

Concerns about extremism

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include 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 children's social care team.

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

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

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

Mental health concerns

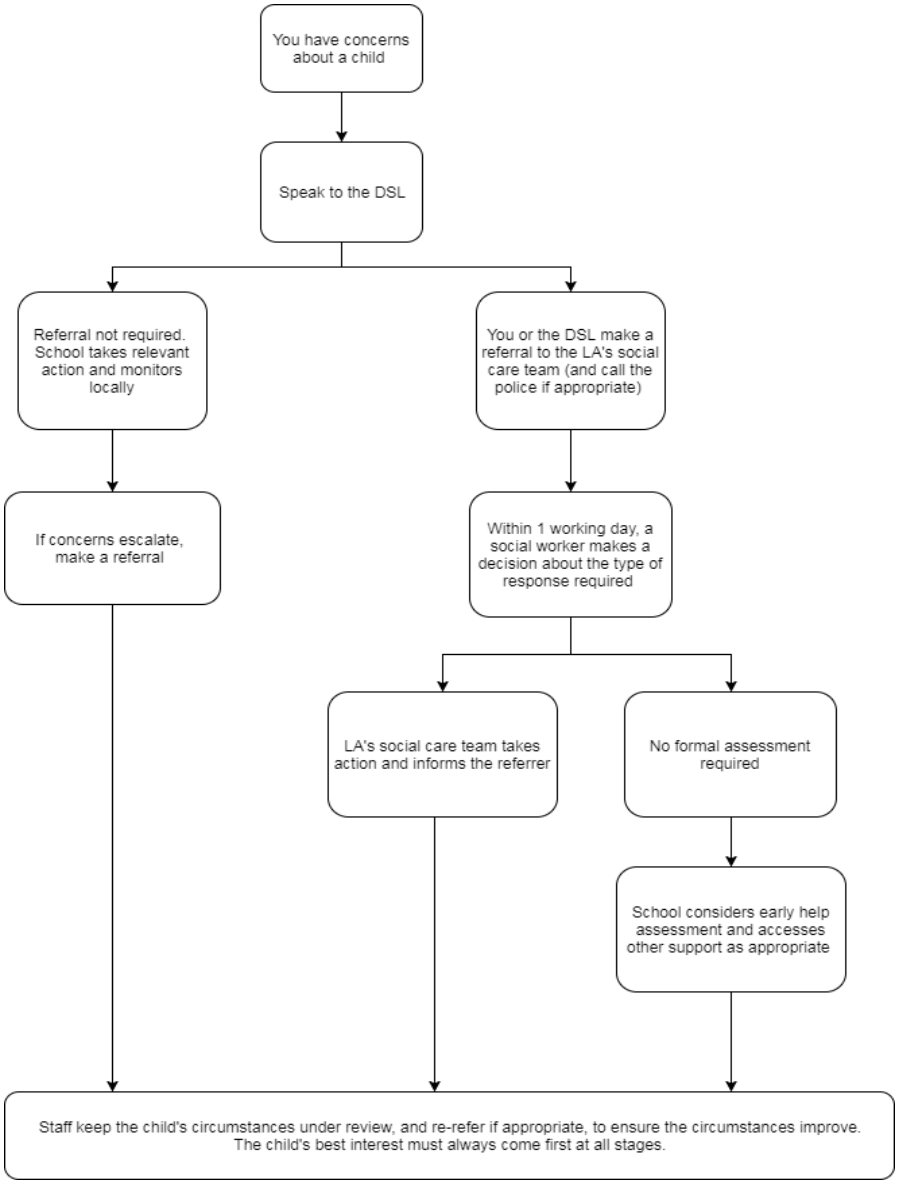
Academy staff should be alert to indicators that a child may be experiencing mental health difficulties, including:

- 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 child has experienced abuse, neglect, exploitation or trauma.

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

Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger) (Note – if the DSL is unavailable, this should not delay action)



Concerns about a staff member

If you have concerns about a member of staff (including a supply staff, Governor, Trustee or volunteer), or an allegation is made about a member of staff posing a risk of harm to young people, speak to the Principal & 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 the Governing Body/Chair of the Board of Trustees will then follow the procedures set out in appendix 6, if appropriate.

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

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 children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Allegations of abuse made against other children (child-on-child abuse)

We recognise that children are capable of abusing their peers. Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator. Early intervention should be considered to reduce the risk of escalation and address underlying safeguarding needs. 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 behaviours and an unsafe environment for students.

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

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

- Is serious, and potentially a criminal offence
- Could put children 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 children being forced to use drugs or alcohol
- Involves harmful or problematic sexual behaviour; children 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 inappropriate pictures or videos (including sharing of nudes or semi-nudes)
- Involves sexual violence

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

If a child makes an allegation of abuse against another child:

- 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 children involved (including alleged victims, the child 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 the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- The Academy will investigate all allegations of child-on-child 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.

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 children 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 at the Academy and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child 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 requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate children about appropriate behaviour and consent
- Ensure children 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 children 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 harms 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 child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child 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 child'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:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

- That a child harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- 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 school 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 children'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 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

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

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

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting 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 on child-on-child abuse 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 child has experienced sexual violence, and show sensitivity to their needs

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

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

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

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

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

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

Initial review meeting

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

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

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

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

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

In applying judgement, the DSL will consider if:

- There is a significant age/developmental difference between the sender/receiver
- There is any coercion or encouragement beyond the sender/receiver
- The imagery was shared or received with the knowledge of the child in the imagery
- The child is more vulnerable than usual
- There is a significant impact on the children involved
- The image is of a severe or extreme nature
- The child understands consent
- The situation is isolated or if the image has been more widely distributed
- The other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances
- The children and have been involved in previous similar incidents

Further review by the DSL

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

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

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

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

Referring to the police

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

Recording incidents

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

Curriculum coverage

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

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

This policy on the sharing of nudes and semi-nudes is also available to students so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

Reporting systems for our children

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

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

To achieve this, we will:

- Put systems in place for children to confidently report abuse
- Build positive relationships between children and staff
- Ensure that the Welfare Team is centrally located and easily accessible to all students
- Ensure our reporting systems are well promoted, easily understood and easily accessible to children
- Make it clear to children that their concerns will be taken seriously, and that they can safely express their views and give feedback

12. Notifying parents/carers

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

Other staff will only talk to parents/carers about any such concerns following consultation with the DSL. If we believe that notifying parents/carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents/carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet/speak with with the victim's parents or carers, with the victim, to discuss what's 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
- Meet/speak with with 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)

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

We recognise that students with SEND or certain health conditions can face additional safeguarding challenges. Children 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 child's disability without further exploration
- Being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children 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 Deaf Academy have EHC plans/SEND, any abuse involving children will require close liaison with the DSL (or deputy) and the SENCO. We will be alert to the extra vulnerabilities our children may face due to the residential nature of our setting.

14. Children with a social worker

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

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

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

15. Looked-after and previously looked-after children

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

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

16. 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 (ASD) 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 children 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, changing arrangements, residential provision, safeguarding plans or requests regarding names and pronouns will be considered on an individual basis using a documented risk assessment and, wherever appropriate, in partnership with parents/carers and relevant professionals. Safeguarding considerations will remain central to decision-making.

17. Online safety, the use of mobile technology and AI

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

To address this, our Academy aims to:
- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of students, staff, volunteers and governors
- 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

The 4 key categories of risk
Our approach to online safety is based on addressing the following categories of risk:
- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, 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 them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

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

    - How to report any incidents of cyber-bullying, ensuring children 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 annual 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, for example that:
    - Staff are allowed to bring their personal phones to academy for their own use, but will limit such use to non-contact time when children are not present
    - Staff will not take pictures or recordings of children/young people on their personal phones or cameras
- Make all children and young people, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in the academy, use of the academy's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, children and parents/carers are aware that staff have the power to search children' phones, as set out in the DfE's guidance
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the academy's IT systems
- 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 protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed

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.

The Academy maintains a separate mobile phone policy which forms part of safeguarding arrangements.

Artificial intelligence (AI)

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

Staff 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 Deaf 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;

- bullying and harassment;
- impersonation;
- 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.

18. 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
- 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.

- Searches will be undertaken in accordance with DfE Searching, Screening and Confiscation Guidance and will be proportionate, lawful, justified and recorded appropriately.
- 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.

19. Whistle-blowing

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

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

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

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

20. 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 children's 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 child protection file for each child.

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

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

If a child for whom the Academy has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main student file.

To allow the new school/college to have support in place when the child 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 school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

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

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

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

21. 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 of time. This footage will be stored securely, for the stated purpose, and only for as long as necessary.

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

Children' 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.

22. Training

All staff

- All staff receive information about the Academy's safeguarding arrangements.
- 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 manager's 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. Safeguarding training will have regard to the Teachers' Standards to support the expectation that all teachers manage behaviour effectively to ensure a good and safe environment and have a clear understanding of the needs of all children.
- All staff will read and understand Part One of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education 2026, at least annually and at time of employment. Staff will provide a signature to say they have read and understood this. This applies to the Governing Body in relation to part 2 of the same guidance.
- Staff with safeguarding responsibilities will receive training from external providers, in addition to in-house enhanced safeguarding training.
- Existing staff will receive enhanced safeguarding training refreshers every two years. If for any reason 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.
- The Safeguarding and Child Protection Policy is available via the Academy website and parents/carers are made aware of this policy, their entitlement to have a copy via the website and the responsibilities of staff members with regard to safeguarding and child protection procedures.
- The Academy provides a coordinated offer of Family Help when additional needs of children are identified and will contribute to Family Help arrangements and inter-agency working and plans.
- The name of the designated members of staff for child protection, the Designated Safeguarding Lead and deputies are clearly advertised in the Academy, alongside contact details for making referrals internally and externally.
- 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 at risk of becoming involved with or supporting terrorism and to challenge extremist ideas (included in the Academy's enhanced safeguarding training).
- 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

Trustees and Governors

All Trustees and Governors 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 school to deliver a robust whole-school approach to safeguarding

As the Chair of the Governing Body and 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.

23. Monitoring arrangements

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

24. Links with other policies

This policy links to the following policies and procedures:

- Young adults and adults at risk safeguarding policy
- Behaviour
- Whistleblowing
- Anti-bullying
- Teaching and learning
- Administration of medicines
- Lanyard protocol
- RSE
- Appropriate touch
- Physical intervention
- E-safety, including staff use of mobile phones

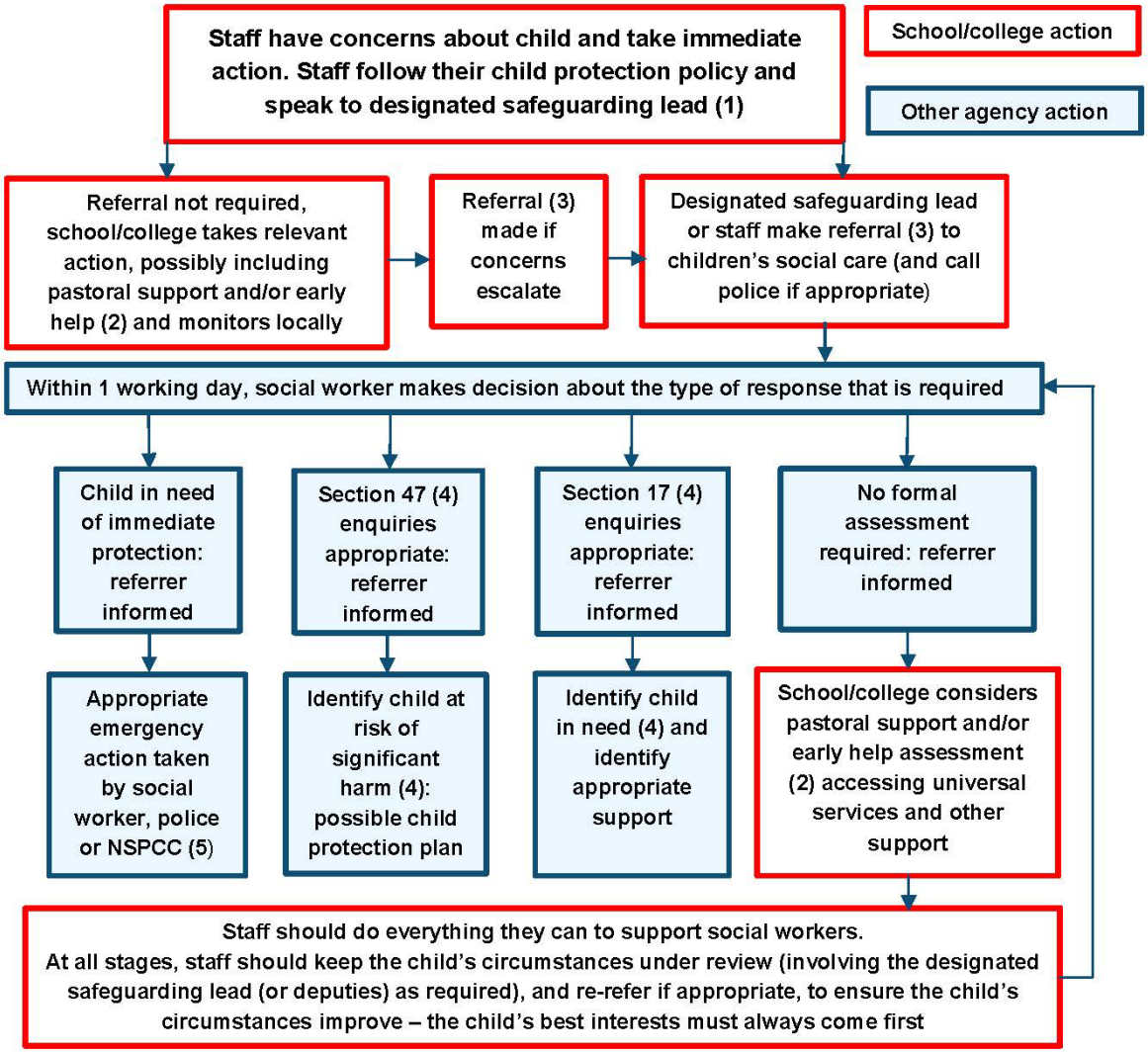
- Social media policy
- Risk assessment
- Recruitment and selection and recruitment of ex-offenders
- Health and safety
- Complaints
- Attendance
- Equality
- Relationships and Sex Education (RSHE)
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children – this has become a required policy
- Privacy notices
- Medical policies

PART B

Appendix 1: Initial safeguarding response to allegations

Children Keeping Safe in Education (September 2026)

Actions where there are concerns about a child



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

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

childline
Childline
childline.org.uk/get-support

Devon Safeguarding Adults Partnership
Care Direct
customer.relations@devon.gov.uk

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)

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

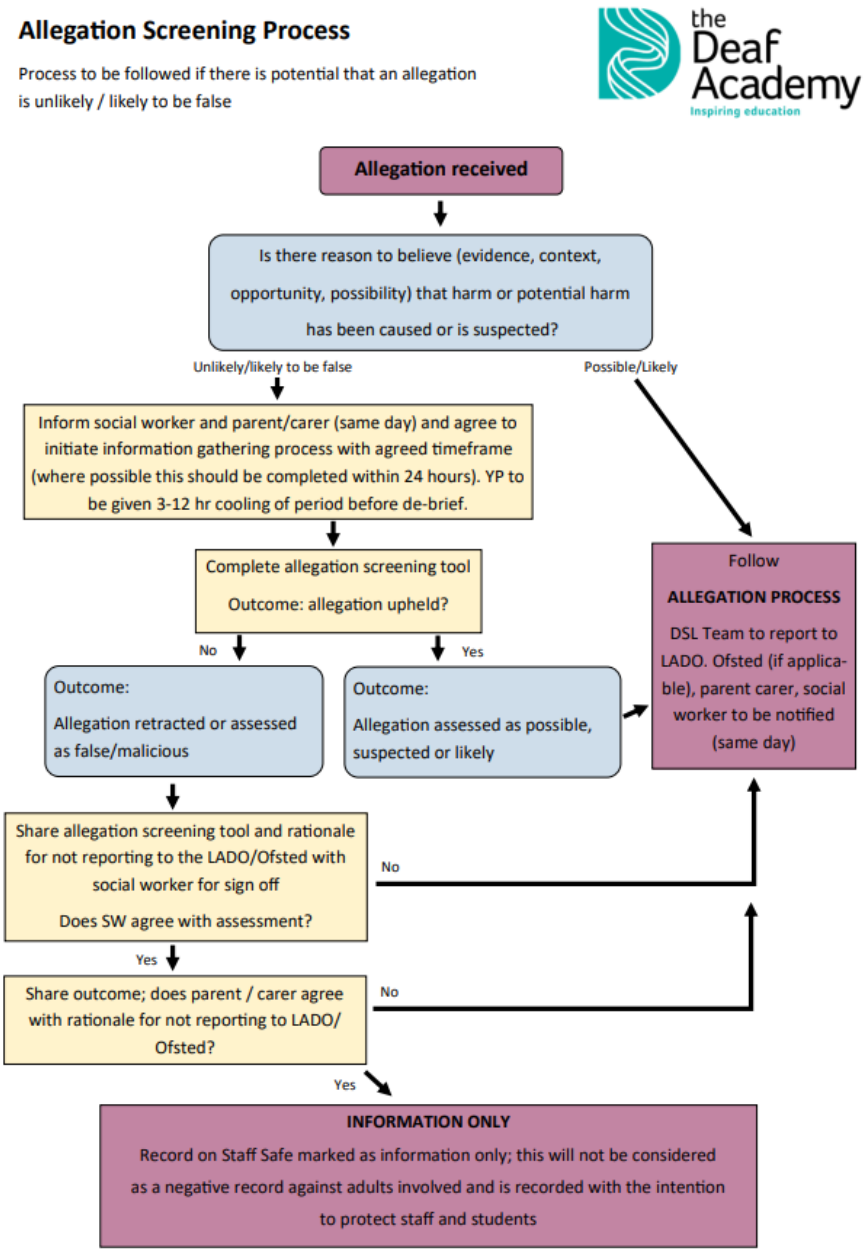
If you are not satisfied with the Academy's Safeguarding response to your concern you can and should refer to appropriate agencies yourself:
MASH 0345 155 1071 mashsecure@devon.gov.uk
CARE DIRECT 0345 1551 007 csc.caredirect@devon.gov.uk
OFSTED contact.ofsted.gov.uk
LADO 01392 384964
POLICE non-emergency 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

Initial safeguarding response to allegations

This screening tool should only be used when an allegation or threat to make an allegation has been made and there is reason to believe that the allegation is unlikely/likely to be false, or it involves a young person with a history of making false allegations and the allegation is not initially thought to be possible/likely.

- This tool should only be used with the agreement of the young person's social worker and parents/carers with agreed timescales for completion (wherever possible within 24 hours).
- If agreement is not obtained from social worker AND parent/carer, or if the allegation is thought to be possible/likely, immediate (same day) referral to LADO/Ofsted should be completed.



Allegation Screening Tool

Date:

Subject/s of allegation:

Children/young people involved/making allegation:

Form completed by (minimum 2 staff):

- This screening tool should only be used when an allegation or threat to make an allegation has been made and there is reason to believe that the allegation is unlikely/likely to be false, or it involves a young person with a history of making false allegations and the allegation is not initially thought to be possible/likely.
- This tool should only be used with the agreement of the young person's social worker and parents/carers with agreed timescales for completion (wherever possible within 24 hours).
- If agreement is not obtained from social worker AND parent/carer, or if the allegation is thought to be possible/likely, immediate (same day) referral to LADO/Ofsted should be completed.
- If at any time during the screening assessment process evidence or concerns are escalated, immediate (same day) referral to the LADO/Ofsted to be completed by the DSL team.

Summary of allegation (to include full names of YP, subject/s of allegation and witnesses):			
No	**Screening Question**	**Y/N**	**Further information/required actions**
1	Has a threat to make an allegation been made, and not an actual allegation?		
2	If the concern is linked to the threat to make an allegation is there reason to believe the threat has been made out of fear or anxiety relating to the adult involved?		
3	Has the YP been harmed?		
4	Is the YP making the allegation at risk?		
5	Is the adult at risk?		
6	Are any other YP or adults at risk of harm or allegation?		
7	Does the YP making the allegation have a profile of making false allegations?		
8	Is there any known potential reason that the YP may have made a false allegation?		
9	Have there been any previous relevant concerns about the adult involved? (conduct, capability, allegations, low-level concerns)		
10	Is there a pattern of behaviours between the adult/child?		
11	Was there opportunity for the allegation to have happened?		
12	Were the YP and adult alone at the time when the incident is alleged to have happened?		
13	Were there witnesses at the time of the alleged allegation? (Add brief summary of witness statement)		
14	Does the account of the adult involved (subject of allegation) support the YP's account? (Add brief summary)		
15	What are the YP's views following de-brief conversation? To be given 3 -12 hr "cooling off" period dependant on known profile (add brief summary)		
16	Has the YP retracted the allegation?		
17	Is it possible that the YP has been coerced/persuaded to retract the allegation?		
18	Are there any current of previous concerns relating to the practice or suitability of the adult/s implicated?		
19	Are there any other complicating factors?		
20	Are there any other protective factors?		
Outcome:			
Allegation possible, suspected or likely?			If yes follow managing allegation process
Allegation retracted or assessed as false / malicious?			If yes record on Staff Safe as 'information only' (this will not be considered as a negative record against adults involved). **Share with social worker and parent/carer – if not satisfied follow allegation process**
Rationale for outcome:			

Bruising and Injuries

Assessment and Procedure

Created: June 2020
Completed by: James Heaver, Assistant Principal, Care & Safeguarding
Date reviewed: April 2025

Spotting the signs of abuse is not always easy. In some cases, professionals may be unable to see past a child's disability to recognise the signs of abuse. A child experiencing abuse or attempting to disclose abuse may self-harm or display inappropriate sexual behaviour or other repetitive and challenging behaviours. This may be misunderstood as part of a child's disability or health condition and can prevent others from recognising the signs of abuse and taking action.

Injuries such as bruising may not raise the same level of concern as they would if seen in a non-disabled child. Bruising on a disabled child may be assumed to have been self-inflicted or caused by disability equipment or problems with mobility.

NSPCC Guidance
Bruising is the most common injury to a child who has been physically abused.

What do we know about bruising?
• Bruising is strongly related to mobility.
• Once children are mobile they sustain bruises from everyday activities and accidents.
• Most children who are able to walk independently have bruises.
• Bruises usually happen when children fall over or bump 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 who are walking/starting to walk, get bruised.
• Most accidental bruises are seen over bony parts of the body such as the knees and elbows, and are often seen on the front of the body.
• It is common to have fractures, particularly rib or metaphyseal fractures, without any bruising.
• Accidental bruising in children with disability is related to the child's level of mobility, equipment used, muscle tone and learning ability.

When should you be concerned?
There are some patterns of bruising that may mean physical abuse has taken place.
• Abusive bruises often occur on soft parts of the body – such as the abdomen, back and buttocks.
• The head is the commonest site of bruising in child abuse. Other common sites include the ear and neck.
• As a result of defending themselves, abused children may have bruising on the forearm, upper arm, back of the leg, hands or feet.
• Clusters of bruises are a common feature in abused children. These are often on the upper arm, outside of the thigh, or on the body.
• Bruises which have petechiae (dots of blood under the skin) around them are found more commonly in children who have been abused than in those injured accidentally.
• Abusive bruises can often carry the imprint of the implement used or the hand.
• Non-accidental head injury or fractures can occur without bruising.

• Severe bruising to the scalp, with swelling around the eyes and no skull fracture, may occur if the child has been "scalped" – ie, had their hair pulled violently.

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 the child's medical and social history, developmental stage and explanation given. Any child who has unexplained signs of pain or illness should be seen promptly by a doctor.

Bruising that suggests the possibility of physical child abuse includes:
- bruising in children 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

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.

Non-collection of children

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

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

Appendix 2 – Types and indicators of abuse

Signs and indicators of abuse

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

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

Risk indicators:

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

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

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

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

The parent or carer may:

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

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

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

Types of abuse

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

Physical

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

Emotional

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people

Sexual abuse

Involves forcing or enticing a child, or an adult who does not or cannot agree, to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, touching outside of clothing or activity where there is an imbalance of power
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). It can also include sexual exposure, inappropriate looking, sexual harassment, or sexual photography without consent

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

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children who exhibit a range of sexually problematic behaviour such as

indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

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

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

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

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

In evaluating sexual behaviour of children, the above information should be used only as a guide. Further information and advice is available in the Devon multi-agency protocol "Working with Sexually Active Young People".

Neglect

The persistent failure to meet an individual's basic physical and/or psychological needs, which is likely to result in the serious impairment of the child's or young person's health or development. Neglect may be deliberate or through failing to understand needs. Neglect may occur during pregnancy as a result of maternal substance abuse.

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

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

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

Self-neglect

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

What is self-neglect?

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

Bullying including cyberbullying

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

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

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

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

We acknowledge that repeated incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents reportable under the Equality Act 2010. The Academy uses a reporting system to record any incidents in line with the latest DFE guidance. The DSL is trained and understands how to report Hate Crime. The DSL understands how to refer to Devon Intercom Trust & Transfigurations for any young person requiring LGBTQ support.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

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

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

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

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

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

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

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

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

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

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

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

Children who are absent from education

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

Children who are persistently absent from education may face similar safeguarding risks to those who are missing from education and staff should remain alert to patterns of absence which may indicate abuse, neglect, exploitation or mental health concerns.

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

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM

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

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

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

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

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

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

Child sexual exploitation

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

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

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

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share

sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

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

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

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

County Lines

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) 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 children of all forms of domestic abuse, including where they see, hear or experience its effects.

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. Children who witness domestic abuse are also victims.

Older children 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 children and affect their health, wellbeing, development and ability to learn.

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

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

Homelessness

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

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

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

Modern slavery

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

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

Online Safety

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

The Academy has a range of approaches and strategies to ensure children remain safe online; this includes digital security, environmental risk assessments, campus safeguarding procedures and student specific risk assessments. Children are taught about online safety throughout the curriculum.
When responding to relevant incidents the Academy will follow guidance on sharing nude and semi-nude images and videos published by the UK Council for Internet Safety (UKCIS) (UKCIS, 2020)

Online Abuse

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

Some examples of online abuse can include:

- trolling
- stealing someone else's identity
- cyber-stalking
- cyberbullying

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

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

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

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

Preventing radicalisation

Radicalisation refers to the process 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 at risk.

We will assess the risk of young people in our academy becoming 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 children 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 children 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 radicalisation and terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in children' behaviour.

The government website Educate Against Hate - Prevent Radicalisation & Extremism and charity NSPCC say that signs that a student is being radicalised can include:

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

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

Indicators of vulnerability include:

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

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

Private fostering

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

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

The Academy recognises that most privately fostered children remain safe and well, but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.
By law, a parent/carer, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a student may be in a private fostering arrangement they will raise this will the DSL and the DSL will notify MASH of the circumstances.

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

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

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

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

FGM (female genital mutilation)

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

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

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

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

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems

- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Mentioning something was done to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Talking about pain or discomfort between her legs

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

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

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

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a student is being forced into marriage, if appropriate they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the student to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

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.

Child-on-child 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 children (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
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- 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 children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content. When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children 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 children are at risk from, or are involved with serious violent crime; These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Serious violence
Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:
- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)

Risk factors which increase the likelihood of involvement in serious violence include:
- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery
- Possession, carrying, use or threatened use of weapons

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.

Organisational abuse
Organisational abuse is the inability to provide a good level of care to an individual or group of people in a care setting such as a hospital or care home, or in a person's own home if they receive care assistance there. It may be a one-off incident, repeated incidents or on-going ill-treatment. It could be due to neglect or poor care because of the arrangements, processes and practices in an organisation. This could include:
- A lack of dignity or respect in a care setting
- Rigid routines or processes organised to meet staff needs rather than the individuals
- Disrespectful attitudes towards individuals receiving care
- A culture of abusive behaviour or tolerance of abusive behaviour
- Repeated failure to prevent abuse, or neglect within a service; including incorrect use of restraint, isolation, or unauthorised deprivations of liberty

Stalking
Stalking can be defined as persistent and unwanted attention that makes an individual feel pestered and harassed. It includes behaviour that happens twice or more, directed at or towards an individual by

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

Discriminatory abuse

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

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

Hate crime

Hate crimes are any criminal acts that are targeted at a person because of hostility or prejudice towards a person's disability, race and ethnicity, religion or belief, sexual orientation, and gender identity. Acts can include physical attacks, verbal abuse, harassment, damage to property, or bullying.

Financial abuse

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

Indicators of financial abuse include:

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

Appendix 3 – Local contacts



Fc **ase contact:**

Telephone: **0345 155 1071**
E-mail: mashsecure@devon.gov.uk mashsecure@devon.gov.uk
Fax: 01392 448951
Enquiry Form available at:
DCC - Request for support

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

Emergency Duty Team – out of hours
0845 6000 388

Police – non emergency – 101

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

Family Help Team
Family Help Information - Devon Safeguarding Children Partnership

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

Appendix 4

The seven golden rules to sharing information

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

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

Appendix 5

Safeguarding escalation procedure

Contents

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

1. Introduction

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

At no time must professional disagreement detract from ensuring that the young person is safeguarded. The young person's welfare and safety must remain paramount throughout.

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

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

2. Potential Areas of Disagreement

A referral not considered to meet the threshold for assessment by children's social care/adult safeguarding HUB;

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

3. Stage One: Preventing Disputes (information sharing)

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

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

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

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

Any action agreed should be fed back immediately to the relevant managers involved and the detail of the conflict and agreements reached should be recorded on the child's file.
1A: Requests for further information/informally questioning judgement.
1 B: Raising a concern formally with the professional concerned by email.

4. Stage Two: Informal Dispute Procedure

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

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

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

5. Stage Three: Formal Dispute Procedure

If despite following the Stage Two process the disagreement remains, the matter will be referred to an appropriate Head of Service within Specialist Children's Services or Adult Services, who will consider the matter with their equivalent level of management within the concerned agency who is in dispute.
The purpose of escalating the dispute to this level is to reach a position where differing professional opinions have been taken into account and efforts made to explore whether the dispute has arisen through lack of clarity or understanding in the professional dialogue. Ultimately a decision will need to be reached where agencies agree a way forward where the interests of the child/adult take precedence over a professional stalemate.

6. Stage Four: Where Disagreements Remain

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

In all cases where it has not been possible to resolve differences and/or where there may be lessons to be learned for future practice, consideration should be given to holding a multi-agency case review. At any stage of the process, any action agreed should be fed back immediately to the second tier management staff involved and the detail of the conflict and agreements reached should be recorded on the child's file.

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

DCFP Case Resolution Protocol

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

Appendix 6

Managing allegations against staff policy and procedure

Introduction

This policy is to be used where there are allegations or concerns about staff, teachers, trustees/Governors or volunteers. This policy is derived from the statutory guidance issue in ***Working Together to Safeguarding Children July 2023*** and ***Keeping children safe in Education Sept 2026***.

The background

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

Reporting concerns

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

Section 1: allegations that may meet the harms threshold

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

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of Academy

If we're in any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer (LADO).

The Academy recognises that allegations involving artificial intelligence (AI), deepfake technology, digitally manipulated images, audio recordings or videos may present safeguarding concerns and require careful investigation.

Where allegations involve AI-generated or manipulated content, the Academy will:

- Treat concerns seriously and assess any immediate safeguarding risk to students, staff or others.
- Preserve relevant evidence and avoid unnecessary sharing of images, recordings or digital content.
- Seek advice from the police, LADO, safeguarding partners, ICT specialists or other relevant agencies where appropriate.
- Consider whether the material may constitute harassment, abuse, sexual harassment, image-based abuse, malicious communications, online exploitation or a criminal offence.
- Consider the welfare and support needs of all individuals involved, including alleged victims and alleged perpetrators.
- Record all actions taken, decisions made and the rationale for those decisions.

The Academy will manage allegations involving AI-generated sexual imagery, deepfakes, impersonation or manipulated content in accordance with safeguarding procedures, relevant legislation and statutory guidance.

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

A 'case manager' will lead any investigation. The case manager will be allocated by the Principal & CEO(or member of SLT in their absence), or the Chair of the Governing Body or Chair of the Board of Trustees where the Principal & CEO is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

A confidential record of the allegation will be recorded on our confidential safeguarding system.

Suspension of the accused until the case is resolved

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

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

- Redeployment within the Academy so that the individual does not have direct contact with the child concerned
- Providing an assistant to be present when the individual has contact with children and young people

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

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's/adult's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children/young people or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's/adult's social care services, where necessary). Where the police and/or children's/adult's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children/young people at the Academy is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's/adult's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children/young people in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's/adult's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that

have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the Academy and their contact details

- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in Academy and/or liaise with the police and/or children's/adult's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Individuals can also access support via the Employee Assistance Programme, which offers a 24-hour helpline from Health Assured to support through any issues or problems.
- Inform the parents or carers of any child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). Inform the parents or carers of any young people over the age of 18 with their consent, unless it is deemed to be in their best interests to inform parents/carers without permission. The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep parents or carers informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

Additional considerations for supply teachers and all contracted staff

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

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

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/young person involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation

- How to manage press interest if, and when, it arises

Record-keeping

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

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

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

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

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

Records containing information about allegations of sexual abuse, will be retained in accordance with current statutory guidance, employment law requirements, safeguarding record retention requirements and the Academy's data retention schedule. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

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

Non-recent allegations
Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.
Where an adult makes an allegation to the Academy that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold/low-level concerns
This section applies to all concerns (including allegations) about members of staff, including supply teachers, agency workers, trainee teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:
- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, young person, parent or other adult within or outside the Academy
- Pre-employment vetting checks

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

Definition of low-level concerns
The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the Academy may have acted in a way that:
- Is inconsistent with the values of the organisation, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:
- Being overly friendly with children
- Having favourites
- Using personal mobile phones for work purposes
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Causing embarrassment
- Creating, sharing or using AI-generated, manipulated or misleading content relating to students, colleagues or the Academy.
- Inappropriate use of artificial intelligence tools, including the creation or sharing of deepfake, image-based or impersonation content.

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

We will create this culture by:
- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the Academy's safeguarding system

The Academy promotes an open culture in relation to the confidential sharing of low-level concerns. The Principal & CEO and DSL lead on the management all concerns ensuring that details remain confidential and information is shared on a need-to-know basis. The need for confidentiality is promoted throughout all investigation processes.

Responding to low-level concerns

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

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

The Principal & CEO (or member of SLT/HRM in their absence) will use the information collected to categorise the type of behaviour and determine any further action, in line with the Academy's disciplinary policy. The Principal & CEO will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

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

Options for responding to low-level concerns may include:

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

Record keeping

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

Records will be:

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

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

References

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

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