



## **Safeguarding and Child Protection Policy**

**Written by Mary Pugsley MBE**

**Last reviewed 18/04/2025**

**Next review date 17/04/2026**

**Mary Pugsley MBE: Director T: 07974750699**

E: [mp.hairattheacademy@gmail.com](mailto:mp.hairattheacademy@gmail.com)

W: [www.hairattheacademy.co.uk](http://www.hairattheacademy.co.uk)

A: Cornerstone 10 Kimberley Rd Exeter EX2 4JG

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Registered office: 8 Feltrim Avenue Exeter Devon EX24RP UKPKN 10047420

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Monitoring, Review, Evaluation of CP and Safeguarding Policy and Procedures 39 Related Safeguarding Portfolio Policies and Procedures 39 Appendices (Appendix 1-6)

**1. Purpose**

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

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

1.2 This policy is one of a series in Hair at the Academy integrated safeguarding portfolio and must be read in conjunction with the portfolio for fuller guidance and explanations. This policy supersedes all existing safeguarding and child protection policies.

1.3 Safeguarding is not just about protecting children, young people and vulnerable adults from deliberate harm, it relates to all forms of abuse including: (this is not a definitive list)

- Neglect
- Physical Abuse
- Sexual Abuse (including Sexual Exploitation)
- Emotional Abuse
- Sexual Violence and Sexual Harassment
- Peer on Peer Abuse
- Female Genital Mutilation (FGM)
- Bullying (including all forms of Digital and Online Bullying)
- Domestic Violence and Abuse
- Radicalisation/Violent Extremism
- Honour Based Violence
- Forced Marriage
- Racist / Homophobic or Transphobic Abuse
- Online Exploitation
- Criminal Exploitation
- Trafficking and Modern-Day Slavery
- Substance Misuse

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1.4 Hair at the Academy also recognises its responsibility under wider safeguarding to ensure that children, young people and vulnerable adults benefit from 'Early Help'. All staff must be particularly alert to the potential need for early help for a child, young person or vulnerable adult who:

- is disabled and has specific additional needs
- has special educational needs (whether, or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised criminal groups (contextualised safeguarding)
- is frequently missing/goes missing from care, home, education
- is at risk of modern slavery, trafficking or criminal exploitation
- is at risk of being radicalised and drawn into violent extremism
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child

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

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

- All children and young people under 18 of age enrolled on full and part-time courses.
- 14-16 School link students on part time programmes
- Vulnerable Adults enrolled at Hair at the Academy
- Visitors to Hair the Academy (under 18)
- Employees, apprentices, work experience students or volunteers who are under 18 years of age

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

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

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

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

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

- ‘Working Together to Safeguard Children’ 2023  
[https://assets.publishing.service.gov.uk/media/6849a7b67cba25f610c7db3f/Working\\_together\\_to\\_safeguard\\_children\\_2023\\_-\\_statutory\\_guidance.pdf](https://assets.publishing.service.gov.uk/media/6849a7b67cba25f610c7db3f/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf)
- Education Act, 2002
- ‘What to Do If You Are Worried a Child Is Being Abused’, 2015  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)
- Keeping Children Safe in Education 2025  
[https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping\\_children\\_safe\\_in\\_education\\_from\\_1\\_September\\_2025.pdf](https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf)
- Devon Children and Families Partnership Multi-Agency Child Protection Procedures  
<http://www.proceduresonline.com/swcpp/devon/index.html>
- Information Sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers, 2018  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)
- Multi Agency Practice Guidelines : Female Genital Mutilation,2016  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/800306/6-1914-HO-Multi\\_Agency\\_Statutory\\_Guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800306/6-1914-HO-Multi_Agency_Statutory_Guidance.pdf)
- Section 11 Children Act, 2004
- Safeguarding Vulnerable Groups Act, 2006
- Devon Safeguarding Adults Board Guidance 2016/17  
<https://new.devon.gov.uk/devonsafeguardingadultsboard/>
- Sexual violence and sexual harassment between children in schools and colleges 2018  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_d](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_d)

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ata/file/719902/Sexual\_violence\_and\_sexual\_harassment\_between\_children\_in\_schools\_and\_colleges.pdf

- HM Government Prevent Duty Guidance for Further Education England and Wales, 2015  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/445915/Prevent\\_Duty\\_Guidance\\_For\\_Further\\_Education\\_\\_England\\_\\_Wales\\_-\\_Interactive.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/445915/Prevent_Duty_Guidance_For_Further_Education__England__Wales_-_Interactive.pdf)
- HM Criminal Exploitation/ County Lines Criminal exploitation of children and vulnerable adults: county lines

1.10 The procedures contained in this policy apply to all staff and directors and are consistent with

those of the Devon Children and Families Partnership Board

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/830121/Keeping\\_children\\_safe\\_in\\_education\\_060919.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/830121/Keeping_children_safe_in_education_060919.pdf)

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

### 1.11 Child Protection Statement

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

1.11.2 The statutory guidance Working Together to Safeguarding Children 2023 • ‘Working Together to Safeguard Children’ 2023

[https://assets.publishing.service.gov.uk/media/6849a7b67cba25f610c7db3f/Working\\_together\\_to\\_safeguard\\_children\\_2023\\_-\\_statutory\\_guidance.pdf](https://assets.publishing.service.gov.uk/media/6849a7b67cba25f610c7db3f/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf)

covers the legislative requirements and expectations on individual services (including colleges) to safeguard and promote the welfare of children and young people. It also provides the framework for DSCB recognises the moral and statutory responsibility to safeguard and promote the welfare of all children, young people and vulnerable adults. We work hard to provide a safe and welcoming environment where young people and vulnerable adults are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children, young people and vulnerable adults receive effective support, protection and justice. The college recognises that all staff have a full and active part to play in protecting children,

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young people and vulnerable adults from harm and that the child's welfare is our paramount concern.

#### 1.11.3 The statutory guidance Working Together to Safeguarding Children 2023

- 'Working Together to Safeguard Children' 2023

[https://assets.publishing.service.gov.uk/media/6849a7b67cba25f610c7db3f/Working\\_together\\_to\\_safeguard\\_children\\_2023\\_-\\_statutory\\_guidance.pdf](https://assets.publishing.service.gov.uk/media/6849a7b67cba25f610c7db3f/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf)

covers the legislative requirements and expectations on individual services (including colleges) to safeguard and promote the welfare of children and young people. It also provides the framework for DSCB takes seriously its responsibility under section 175 of the Education Act 2002 and section 11 of the Children Act 2004, to safeguard and promote the welfare of children and young people and to work together with other agencies to ensure adequate arrangements are in place to identify, assess and support those children who are suffering harm.

## **2. Definitions**

- Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.
- Child Protection refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.
- Staff refers to all those working for or on behalf of the Hair at the Academy full time or part time, temporary or permanent, in either a paid or voluntary capacity.
- Child includes everyone under the age of 18.
- Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.
- Vulnerable Adult refers to someone aged 18 or over: who is, or may be, in need of community services due to age, illness or a mental or physical disability. Who is, or may be, unable to take care of himself/herself, or unable to protect himself/herself against significant harm or exploitation.
- Designated Safeguarding Lead (DSL) is the first point of contact for any member of staff who has a concern about the safety and wellbeing of a child, young person or vulnerable adult.
- Deputy Designated Safeguarding Lead (DDSL) the deputy is the first point of contact in the absence of the DSL to avoid any unnecessary delays in responding to a child/young person's/vulnerable adult's needs.
- Prevent refers to the Government's strategy to prevent young people and vulnerable adults becoming radicalised
- Prevent Single Point of Contact is the person identified in Hair at the Academy as the point of contact for all prevent related incidents and concerns.

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- Safeguarding Team refers to the team of Level 3 Child Protection trained staff who support the DSL and DDSL in safeguarding and child protection across the whole college
- LAC Designated Person is the person who has responsibility for Looked After Young People
- Abuse: refers to a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

### **3 Policy**

3.1 Hair at the Academy policy and procedures for safeguarding children, young people and vulnerable

adults will be in line with Devon Children and Families Partnership Child Protection procedures and the South West Child Protection procedures <https://www.dcfp.org.uk/> and KCSiE Working Together to Safeguard children 'Working Together to Safeguard Children' 2025 [https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping\\_children\\_safe\\_in\\_education\\_from\\_1\\_September\\_2025.pdf](https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf)

3.2 Hair at the Academy will ensure that the Directors and Senior Management Team understands and fulfils

its safeguarding responsibilities and recognises that it plays an important part of the wider safeguarding system for children and young people, as described in the statutory guidance Working Together to Safeguard Children 2025.

3.3 Under Section 175 of the Education Act 2002 the Directors of the College make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of young people.

3.4 There is a Designated Safeguarding Lead (DSL) and a Deputy Designated Safeguarding Lead (DDSL)

who have undertaken level 3 Child Protection training and who update their training on a yearly basis as required by this position. Governing bodies and proprietors have ensured that the DSL is an appropriate senior member of staff, from the college leadership team. The designated safeguarding lead takes lead responsibility for safeguarding and child protection in the College.

### **3.5 Policy Principals**

- The welfare of the child, young person, vulnerable adult is paramount
- Safeguarding is everyone's responsibility
- All children, young people and vulnerable adults, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection

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- All staff have an equal responsibility to act on any suspicion, concern or disclosure that may suggest a child is at risk of harm
- Students and staff involved in child protection issues will receive appropriate support
- All staff members are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- When concerned about the welfare of a young person or vulnerable adult, staff members should always act in the interests of the child, young person/vulnerable adult.

### 3.6 Policy Aims

This Policy aims to:

- Provide all staff with the necessary information to enable them to meet their child protection and safeguarding responsibilities; remembering that "Safeguarding is everyone's responsibility"
- To ensure consistent good practice.
- To demonstrate Hair at the Academy's commitment regarding child protection to the student, parents and other partners.
- To support young people's development in ways that will foster security, confidence and independence.
- Raise awareness in all staff of the need to safeguard children, young people, and vulnerable adults, and of their responsibilities in identifying and reporting possible cases of abuse and vulnerability.
- To promote an environment in which young people feel safe, secure, valued and respected, and feel confident to, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- To ensure that all staff working within Hair at the 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 in KCSiE) and a single central record is kept for audit purposes.

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

## **4 Roles and Responsibilities**

4.1 We understand that our responsibility to safeguard children, young people and vulnerable adults requires that we appropriately share any concerns that we may have about them with our multi agency partners, in line with the statutory guidance in 'Working Together 2025' and KCSiE 2025 and 'Information Sharing 2018'

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4.2 Hair at the Academy has a DSL and a DDSL supported by a Safeguarding team, who are responsible for the monitoring of child protection and safeguarding of students within the college. They act as a focal point for staff to discuss concerns and liaise with other agencies and professionals.

#### 4.3 Key Staff

##### Key Staff

The Senior Designated person for Safeguarding and Child Protection (DSL) is: Mary Pugsley MBE  
Email: [Mp.hairattheacademy@gmail.com](mailto:Mp.hairattheacademy@gmail.com)

The Deputy Designated Persons (DDSL) are:

Victoria Fricker and Tyler Gray

Email:

Victoria Fricker: [vf.hairattheacademy@gmail.com](mailto:vf.hairattheacademy@gmail.com)

Tyler Gray: [tg.hairattheacademy@gmail.com](mailto:tg.hairattheacademy@gmail.com)

The Single Point of Contact (SPOC) for Prevent is: Mary Pugsley MBE

Designated Persons for looked after young people and previously looked after young people is:

Mary Pugsley and Kat Parsley

Kat Parsley: [kparsley.hairattheacademy@gmail.com](mailto:kparsley.hairattheacademy@gmail.com)

4.4 The Role of the Designated Safeguarding Lead (KCSiE, 2025) The DSL will be appropriately trained and this training will be regularly updated in line with statutory guidance, to carry out those functions necessary to ensure the ongoing safety and protection of young people and vulnerable adults. In the event of the long-term absence of the designated safeguarding lead, the deputy will assume all the functions above.

The Designated Safeguarding Lead:

- holds ultimate responsibility for safeguarding and child protection in the Hair at the Academy
- acts as a source of support and expertise in carrying out safeguarding duties for the whole Hair at the Academy community;
- encourages a culture of listening to young people and taking account of their wishes and feelings;
- is appropriately trained and has regular updates to their training and will refresh their knowledge and skills at regular intervals but at least annually;
- will refer a child/young person/vulnerable adult if there are concerns about possible abuse, to the Multi Agency Safeguarding Hub
- will refer cases where a crime may have been committed to the Police as required.
- will refer cases in collaboration with the Head of HR where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- as required, and with the support of the Head of HR liaise with the “case manager” and the

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designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;

- will keep detailed, accurate records, either written or using appropriate online software, of all concerns about a child/young person/vulnerable adult even if there is no need to make an immediate referral;
- will act as a point of contact with the three safeguarding partners;
- will liaise with the Principal to inform him of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- liaise with staff (especially tutors) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- act as a source of support, advice and expertise for all staff.
- will with the support of the Hair at the Academy DPO ensure that all Child Protection records are kept confidential, stored securely and are separate from student records, until the student's 25th birthday or for 7 years after they complete their education at the Hair at the Academy in line with statutory guidance
- will ensure that when a student leaves Hair at the Academy early to join a different college/6th form, their child protection file is passed to the new provider (ensuring secure transit) and that confirmation of receipt is obtained;
- In addition to the child protection file, the designated safeguarding lead will also consider if it would be appropriate to share any information with the new school or college in advance of a young person leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.
- has a working knowledge of DCFP (Devon Children and Families Partnership) Child Protection procedures;
- will ensure that either they, or another staff member, attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report where required which has been shared with the parents;
- will ensure that any student currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to the MASH Team;
- will ensure that all staff sign to say they have read, understood and agree to work within Hair at the Academy's child protection policy, staff code of conduct and Keeping Children Safe in Education Part 1 2022 and ensure that the policies are used appropriately;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able, to provide advice and support to staff on protecting children from the risk of radicalisation
- will refer cases to the Channel programme where there is a radicalisation concern as required; and support staff who make referrals to the Channel programme;
- will organise child protection and safeguarding training, regularly updated training and a minimum of annual updates for staff and will keep a record of attendance and with the Head of HR address any absences;

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- understands locally agreed processes for providing early help and intervention and will support members of staff where Early Help is appropriate;
- will ensure that the name of the designated members of staff for Child Protection, the Designated Safeguarding Lead and deputy, are clearly advertised in Hair at the Academy
- will ensure the college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents know referrals about suspected abuse or neglect may be made and the role of Hair at the Academy in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

For further detail see 'Keeping Children Safe in Education 2025

[https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping\\_children\\_safe\\_in\\_education\\_from\\_1\\_September\\_2025.pdf](https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf)

#### 4.5 The Deputy Designated Safeguarding Lead

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

#### 4.6 The Role of all staff

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

4.6.2 All Hair at the Academy staff should identify children that may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's/young person's life, from the foundation years through to the teenage years. In the first instance staff should discuss early help requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in an early help assessment

4.6.3. Anyone who has a concern about a child/young person's welfare should ensure a referral is made to the Multi Agency Safeguarding Hub (MASH). In the first instance staff should discuss

**Mary Pugsley MBE: Director T: 07974750699**

E: [mp.hairattheacademy@gmail.com](mailto:mp.hairattheacademy@gmail.com)

W: [www.hairattheacademy.co.uk](http://www.hairattheacademy.co.uk)

A: Cornerstone 10 Kimberley Rd Exeter EX2 4JG

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any potential referral with the designated safeguarding lead, who in most instances would make any referral. Staff may be required to support social workers and other agencies following any referral.

4.6.4 Hair at the Academy's 'Staff Code of Conduct'. All staff will be made aware of the Staff Code of Conduct at induction and all are required to sign this.

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

- treating all learners with respect
- setting a good example by conducting themselves appropriately
- involving learners in decisions that affect them
- encouraging positive, respectful and safe behaviour among learners
- being a good listener
- being alert to changes in learners' behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the Hair at the Academy child protection policy, staff code of conduct and guidance documents on wider safeguarding issues (Part 1 and Annexe A of 'Keeping Children Safe in Education' 2025)
- maintaining appropriate boundaries with learners including online activity and contact.
- being aware that the personal and family circumstances and lifestyles of some learners lead to an increased risk of abuse
- referring all concerns about a learner's safety and welfare to the DSL, or, if necessary directly to police or children's social care

4.6.6 Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount.

4.6.7 All concerns of poor practice or possible child abuse by colleagues should be reported to the DSL

#### 4.7 Allegations against staff

4.7.1 When an allegation is made against a member of staff, our set procedures must be followed.

**Mary Pugsley MBE: Director T: 07974750699**

E: [mp.hairattheacademy@gmail.com](mailto:mp.hairattheacademy@gmail.com)

W: [www.hairattheacademy.co.uk](http://www.hairattheacademy.co.uk)

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

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

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

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

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

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

4.7.8 Our complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a student or attempting to humiliate them, bullying or belittling a student or discriminating against them in some way.

4.7.9 Complaints which escalate into a child protection concern will automatically be managed under Hair at the Academy's child protection procedures.

#### 4.8 Staff training

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

**Mary Pugsley MBE: Director T: 07974750699**

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4.8.2 New staff will receive Child Protection training as part of their induction, which includes being sent a link to 'Keeping Children Safe in Education Part 1' 2025's the Child Protection policy and Staff Code of Conduct.

#### 4.9 Abuse of Positions of Trust

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

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

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

4.9.6 We understand that staff should have access to advice on the boundaries of appropriate behaviour. The document 'Guidance for safer working practices for those working with children and young people in education settings (2015)' provides advice on this and the circumstances which should be avoided to limit complaints against staff of abuse of trust and/or allegations of physical or sexual abuse. Safeguarding in education is a part of the Staff development programme.

### **5 Safer Recruitment**

5.1 Hair at the Academy complies with the requirements of Keeping Children Safe in Education (DfE 2019)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/830121/Keeping\\_children\\_safe\\_in\\_education\\_060919.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/830121/Keeping_children_safe_in_education_060919.pdf) page 30 and the DCFP Child Protection procedures by carrying out the required checks and verifying the applicant's identity, qualifications and work history.

5.2 Contractors. Hair at the Academy checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance.

### **6 Site Security**

6.1 All visitors to the Hair at the Academy site including contractors, are asked to sign in and are given a coloured lanyard, which confirms they have permission to be on site. Parents who are

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simply delivering or collecting their young person from reception or college do not need to sign in, unless they are going into buildings.

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

## **7 Photography and images**

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

7.2 To protect students we will:

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

## **8 Off Site Activities**

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

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

## **9 Bullying**

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

9.2 All incidences of bullying, including cyber-bullying and prejudice-based bullying should be

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W: [www.hairattheacademy.co.uk](http://www.hairattheacademy.co.uk)

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reported and will be managed through our tackling-bullying procedures. All students and parents receive a copy of the procedures on joining the college and the subject of bullying is addressed at regular intervals in PSHE education. If the bullying is particularly serious, or the tackling bullying procedures are deemed to be ineffective, the DSL will consider implementing child protection procedures.

Hair at the Academy will take seriously any incident or allegation of sexual harassment or sexual violence between young people that is brought to our attention. We will follow the guidance as set out on the DfE document Sexual Harassment and Sexual Violence between children and young people in schools and colleges (revised version 2018).

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

### **10 Children with sexually harmful behaviour (Peer on Peer Abuse)**

10.1 Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the Hair at the Academy's anti-bullying procedures where necessary. However, there will be occasions when a student's behaviour warrants a response under child protection rather than anti-bullying procedures. Research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

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

### **11 The Sexual Exploitation**

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

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

11.3 Hair at the Academy will engage with and make referrals to the MACE process and the REACH Team when and where appropriate and make an enquiry to MASH for any child that goes missing, where there are significant concerns and if they are not known to Children's Services.

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## **12 Female Genital Mutilation**

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

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

12.3 In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both.  
<https://www.gov.uk/government/collections/female-genital-mutilation>

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

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

## **13 Forced Marriage**

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

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

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

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13.4 Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.  
<https://www.gov.uk/guidance/forced-marriage>

#### **14 Honour-Based Violence**

14.1 'Honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

14.2 One Chance Rule. Staff will be made aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBV. Staff recognise they may only have one chance' to speak to a student who is a potential victim and have just one chance to save a life.

#### **15 Radicalisation and Extremism**

15.1 The Prevent Duty -The DSL is the designated Single Point of Contact (SPOC) for Hair at the Academy in matters relating to Prevent.

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

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

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

15.5 All staff receive training to help to identify signs of extremism. Opportunities are provided in the tutorial and general curriculum to enable students to discuss issues of religion, ethnicity and culture and the College follows the DfE advice in Promoting fundamental British Values as part of SMCS (spiritual, moral, social and cultural education) in Colleges (2014)

15.6 Further information on Preventing Radicalisation' has been included in Keeping Children Safe in Education 2022) in line with: Prevent Duty Guidance , published in March 2015 as part as

**Mary Pugsley MBE: Director T: 07974750699**

E: [mp.hairattheacademy@gmail.com](mailto:mp.hairattheacademy@gmail.com)

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the UK's Counter Terrorism strategy. (P.10-15 for colleges, registered childcare providers and further education).

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

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/380595/SMSC\\_Guidance\\_Maintained\\_Colleges.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Colleges.pdf)

## **16 Death of a learner**

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

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

## **17 Indicators of abuse**

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

17.2 A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries, show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships

**Mary Pugsley MBE: Director T: 07974750699**

E: [mp.hairattheacademy@gmail.com](mailto:mp.hairattheacademy@gmail.com)

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

17.3 Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should

be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. The Safeguarding team will use the Devon's Threshold Tool, when making an assessment as to whether to refer a concern to the MASH. It is very important that staff report their concerns – they do not need 'absolute proof' that the child is at risk.

### **18 The Impact of Abuse; Taking Action; Information Sharing**

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

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

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

- in an emergency take the action necessary to help the child, if necessary call 999
- report your concern as soon as possible to the DSL, by the end of the day
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern

**Mary Pugsley MBE: Director T: 07974750699**

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- seek support for yourself if you are distressed.

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

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

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

#### 18.6 Managing a Disclosure

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During a disclosure, staff should:

- allow the learner to speak freely
- remain calm and not overreact – the individual may stop talking if they feel they are upsetting their listener; be reassuring
- allow silences – be aware of how hard this must be for the individual
- under no circumstances ask investigative questions – what, who, where... Can ask TED questions: 'Tell me.... Explain..... Describe'...
- at an appropriate time tell the student that to help them, you must pass the information on to the Safeguarding lead
- not automatically offer any physical touch as comfort. It may be anything but comforting to a person who has been abused
- avoid admonishing the individual for not disclosing earlier. Saying things such as 'I do wish you

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had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong

- tell the student what will happen next
- report verbally asap to the DSL even if the child has promised to do it by themselves
- complete an Incident Report as soon as possible; include any notes made
- seek support for yourself if needed

concerns with the DSL. All sensitive information and the chronology will be recorded in the incident record.

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

18.7 Hair at the Academy will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively. The DSL/DDSL/Member of Safeguarding Team will contact the parent in the event of a concern, suspicion or disclosure.

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

18.8 The DSL/DDSL/Member of Safeguarding Team will make an enquiry to the MASH if it is believed that a student is suffering or is at risk of suffering significant harm. The student (subject to their age and understanding) and the parents will be told that an enquiry is being made, unless to do so would increase the risk to the child. Hair at the Academy procedure must be followed always, and all concerns and actions will be recorded on the incident record.

18.9 Information Sharing Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many serious case reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe.

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

#### Statutory guidance

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf) states that college staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.

**Mary Pugsley MBE: Director T: 07974750699**

E: [mp.hairattheacademy@gmail.com](mailto:mp.hairattheacademy@gmail.com)

W: [www.hairattheacademy.co.uk](http://www.hairattheacademy.co.uk)

A: Cornerstone 10 Kimberley Rd Exeter EX2 4JG

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It is important that we are all aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

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

18.11 Staff should only discuss concerns with the DSL (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis in line with statutory guidance given in Information Sharing 2018 and Keeping Children Safe in Education 2022([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/830121/Keeping\\_children\\_safe\\_in\\_education\\_060919.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/830121/Keeping_children_safe_in_education_060919.pdf))

18.12 Child Protection information will be stored and handled in line with the Data Protection Act 2018, Information Sharing 2018 and Keeping Children Safe in Education Statutory guidance 2022 and is

guided by the following principles. The information is:

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

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

18.14 Safeguarding Referral forms and other written information will be stored in a locked facility and any electronic information will be secure password protected and only made available to relevant individuals on a need-to-know basis. Learners' chronologies will be stored on the secure incident record.

18.15 Every effort will be made to prevent unauthorised access, and sensitive information should not routinely be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media,

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such as a CD or flash drive, these items will also be kept in locked storage. Child protection information will be stored separately from a student's college file.

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

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

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

18.19 The Data Protection Act does not prevent college staff from sharing information with relevant agencies, where that information may help to protect a child or support a criminal investigation. [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419628/Information\\_sharing\\_advice\\_safeguarding\\_practitioners.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf)

### **19 Looked After Children; Care Leavers**

19.1 The most common reason for children becoming looked after is because of abuse or neglect. Hair at the Academy ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child.

19.2 The designated Looked After Young Persons Lead has overarching responsibility for LAC; Care Leavers and young people who live independently from their parental home supported by the DSL. The Welfare Lead will have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

### **20 Private Fostering**

20.1 A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential college, children's

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home or hospital are not considered to be privately fostered. Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

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

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

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

## **21 Children, young people, adults who may be particularly vulnerable to abuse**

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

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

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

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

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

**22 Digital and Online Safety** - Hair at the Academy takes its responsibility to ensure that students are safe online and receive appropriate information on keeping themselves safe, as part of their induction

### **23 Youth produced sexual imagery (sexting)**

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

23.2 Youth produced sexual imagery refers to both images and videos where;

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

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

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

23.5 If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or,

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if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery.

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

An immediate referral at the initial review stages should be made to MASH/Police if;

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

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

23.8 In applying judgement, the DSL will consider if;

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

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

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

#### **24 Building resilience and promoting positive behaviour**

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

24.2 All teaching and support staff should be aware of their duty to challenge inappropriate behaviour to safeguard all students and staff.

#### **25 Support for those involved in a child protection issue**

25.1 Any form of abuse is devastating for the child/young person and can also result in distress and anxiety for their family and friends and for staff who become involved

25.2 Hair at the Academy will support students and their families by:

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

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25.3 We recognize that staff who have become involved with a child/young person /vulnerable adult who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful or upsetting.

25.4 We will support such staff by providing an opportunity to talk through their anxieties and to seek further support.

### **26 Reporting directly to Child Protection Agencies**

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the Designated Safeguarding Lead, their deputy are not available.
- they are convinced that a direct report is the only way to ensure the student's safety.
- for any other reason they make a judgement that direct referral is in the best interests of the child, young person.

### **Appendix 1. MASH Referral Details**

Making a MASH enquiry (for professionals)

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

Before making an enquiry

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

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

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

When to make an enquiry

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

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

How to make an enquiry

**Mary Pugsley MBE: Director T: 07974750699**

E: [mp.hairattheacademy@gmail.com](mailto:mp.hairattheacademy@gmail.com)

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Complete the multi-agency enquiry form in as much detail as possible. The information you provide will support threshold decisions and contribute to a single assessment or DAF if this has not been done already.

**Urgent enquiries**

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

Multi-Agency Safeguarding Hub PO Box 723

Exeter

EX1 9QS

**Mary Pugsley MBE: Director T: 07974750699**

E: [mp.hairattheacademy@gmail.com](mailto:mp.hairattheacademy@gmail.com)

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