

Mary Pugsley MBE

Director, Hair At The Academy



Safeguarding and Child Protection Policy

Written by Mary Pugsley MBE

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Contents

1. Purpose, scope and principles
 2. Legal and safeguarding framework
 3. Safeguarding leadership and governance
 4. Responsibilities of all staff
 5. Responding to concerns, Early Help and DCFD/MASH referrals
 6. Child protection records, information sharing and transfer
 7. Specific safeguarding risks
 8. Concerns and allegations about adults working with children
 9. Safer recruitment, visitors, contractors and premises
 10. Training and safeguarding culture
 11. Online safety, technology and attendance
 12. Support, equality and vulnerable learners
 13. Monitoring and review
 14. Related policies
- Appendix 1. Key contacts and DCFD referral details
- Appendix 2. Legislation and statutory guidance

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1. Purpose, scope and principles

Hair at the Academy is committed to safeguarding and promoting the welfare of children and young people. This policy applies to all staff, directors, managers, volunteers, contractors, visitors and students and is written for an alternative provision context. It should be read alongside the provision's staff code of conduct, safer recruitment, whistleblowing, cyber security and online safety, attendance, behaviour, health and safety and related safeguarding procedures.

For this policy, a child is anyone under 18. Where the provision supports adults at risk, relevant adult safeguarding procedures also apply.

- The welfare of the child is paramount and safeguarding is everyone's responsibility.
- Staff will maintain an attitude of "it could happen here" and act in the child's best interests.
- Children may not feel ready or able to disclose abuse, exploitation or neglect and may not recognise their experiences as harmful. Lack of disclosure does not reduce the need to act on concerns.
- Abuse, neglect and exploitation are rarely standalone events. Risk may arise at home, in education, in the community, online or through peers and wider networks.
- Hair at the Academy is an agent of referral, not investigation. Staff record, report and share concerns; statutory agencies investigate.

2. Legal and safeguarding framework

The provision will have regard to the legislation and guidance relevant to its legal status and commissioning arrangements. School-specific duties are applied where legally applicable or required by contract/commissioning arrangements; non-school alternative provision will also have regard to DfE alternative provision guidance and voluntary national standards.

- Keeping Children Safe in Education (KCSIE) 2026, including Part 1 for staff working directly with children;
- Working Together to Safeguard Children 2026 and local Devon Safeguarding Children Partnership procedures;
- Alternative Provision statutory guidance and the Non-school Alternative Provision Voluntary National Standards;
- Children Acts 1989 and 2004; Education Act 2002 where applicable; Equality Act 2010; Human Rights Act 1998; Data Protection Act 2018 and UK GDPR;
- Counter-Terrorism and Security Act 2015 and Prevent duty guidance; Safeguarding Vulnerable Groups Act 2006; Sexual Offences Act 2003; Female Genital Mutilation Act 2003; Modern Slavery Act 2015 and Domestic Abuse Act 2021.

3. Safeguarding leadership and governance

3.1 Strategic leadership

- A Director, Senior Manager and/or Trustee will champion safeguarding and child protection and hold strategic oversight of safeguarding arrangements.
- Strategic leaders will understand the legal and safeguarding framework relevant to the provision, including KCSIE, the Equality Act 2010 and Human Rights Act 1998, and will receive appropriate safeguarding and child protection training.
- Leaders will ensure sufficient resources, safer recruitment arrangements, appropriate policies, training, quality assurance and action on safeguarding risks.

3.2 Designated Safeguarding Lead (DSL)

The DSL is a senior member of staff with lead responsibility for safeguarding and child protection.

The DSL

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Tel: 01392 574097 or 07974 750699;

Email: mp.hairattheacademy@gmail.com .

Deputy DSLs

Victoria Fricker

Tel: 01392 574097

Email: vf.hairattheacademy@gmail.com

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Mary Pugsley MBE

Director, Hair At The Academy

Tyler Gray

Tel: 01392 574097

Email: tg.hairattheacademy@gmail.com

Community DSL:

Rhi Belcher

Tel: 01392 574097

Email: rb.hairattheacademy@gmail.com

Prevent SPOC:

Mary Pugsley MBE

Tel: 01392 574097 or 07974 750699;

Email: mp.hairattheacademy@gmail.com .

Designated person for looked-after and previously looked-after young people:

Kat Parsley

Tel: 01392 574097

Email: kparsley.hairattheacademy@gmail.com

- The DSL will be available to staff throughout the hours children and young people are being supported. If unavailable, a suitably trained deputy will provide cover and be able to act without delay.
- The DSL and deputies will be trained to an appropriate advanced level and update their knowledge at least annually. The DSL will have access to regular professional supervision and/or safeguarding monitoring, CPD and further development.
- The DSL will advise and support staff, make or oversee referrals, liaise with safeguarding partners, police, LADO, commissioners and other agencies, attend multi-agency meetings where required, and ensure actions and outcomes are recorded.
- The DSL will proactively follow up Devon Children's Front Door (DCFD)/MASH referrals or enquiries where acknowledgement or outcome has not been received within the expected timeframe.
- The DSL will ensure relevant safeguarding/welfare information and child protection files are securely transferred to a receiving school, college, further education or alternative provision setting when a student moves, with confirmation of receipt. Where necessary, key information will be shared in advance so support is ready on arrival.
- The DSL will ensure the commissioning school, local authority or other relevant authority is updated promptly about significant safeguarding concerns and risk-management actions, subject to lawful information sharing and the child's best interests.

4. Responsibilities of all staff

All staff working directly with children and young people must understand their individual safeguarding role and the systems operating within the provision. They must:

- read and understand at least Part 1 of the current KCSIE where applicable/required and confirm this through staff records;
- know the DSL/DDSLs, how to report concerns and how to contact Children's Social Care/DCFD/MASH or police when necessary;
- recognise signs of abuse, neglect, exploitation, child-on-child abuse, poor mental health, online harm, radicalisation and other safeguarding risks;
- understand Early Help and identify children, young people and families who may benefit from support as soon as difficulties emerge;
- act immediately on welfare concerns, record facts accurately and escalate through the appropriate process;
- share pertinent information early. No single practitioner has a complete picture of a child, and Data Protection Act 2018/UK GDPR do not prevent proportionate information sharing to safeguard children;
- recognise that repeated or prolonged absence, missing education or unexplained changes in attendance may indicate safeguarding risk;

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- challenge, record and report sexual harassment, sexual violence and harmful sexual behaviour; such behaviour must never be dismissed as banter, insignificant or trivial;
- report concerns about a colleague, volunteer, contractor or other adult working with children, including low-level concerns and allegations that may meet the harm threshold.

5. Responding to concerns, Early Help and DCFD/MASH referrals

5.1 Immediate response

- Listen carefully and take the child seriously. Do not promise confidentiality or ask leading/investigative questions.
- If a child is in immediate danger or a crime is in progress, call 999.
- Record the concern promptly in the provision's safeguarding system and report it to the DSL/DDSL without delay.
- If the DSL/DDSL is unavailable and delay could place a child at risk, staff must make a referral directly to Children's Social Care/DCFD and/or police and inform the DSL as soon as possible.

5.2 Early Help

Staff should identify emerging needs early and discuss them with the DSL. The provision will work with families and partner agencies to provide or contribute to Early Help where appropriate. If needs escalate or there is reasonable cause to suspect significant harm, a referral to Children's Social Care must not be delayed.

5.3 Devon Children's Front Door (DCFD) / MASH

Devon Children's Front Door is the local route for professional requests for support and incorporates multi-agency safeguarding arrangements. The current Devon Safeguarding Children Partnership process must be followed.

- Professional referrals/requests for support should use the current DCFD online Request for Support route. Staff must use current published arrangements rather than obsolete email addresses.
- Urgent safeguarding concerns: telephone DCFD on 0345 155 1071. Immediate danger: 999. Out of hours: Emergency Duty Service 0345 6000 388.
- Consent should normally be sought where appropriate, but must not be sought or relied upon where doing so could increase risk, prejudice an investigation or where there is another lawful basis to share information to safeguard a child.
- The DSL will record the referral, rationale, information shared, advice received, decisions, actions, outcome and follow-up. If no response/outcome is received, the DSL will actively follow up and escalate where necessary.

6. Child protection records, information sharing and transfer

- Safeguarding records will be accurate, contemporaneous, secure and sufficiently detailed to show the child's lived experience, concerns, chronology, professional judgement, decisions, referrals, information sharing, actions, outcomes and follow-up.
- Records will be kept separately from general education records where appropriate, with access limited to those who need to know. Retention will follow applicable statutory, commissioning and records-management requirements.
- Information will be shared lawfully, proportionately, securely and as early as necessary to identify, assess and respond to risk. Fears about data protection must not prevent safeguarding information being shared when lawful and necessary.
- When a student moves setting, the DSL will ensure safeguarding information is transferred securely and promptly and receipt is confirmed.

7. Specific safeguarding risks

Staff training and practice will address the safeguarding risks relevant to the cohort and local context. Concerns must be reported to the DSL and responded to under the procedures above. These include:

- physical, emotional and sexual abuse and neglect;
- child-on-child abuse, bullying, cyberbullying, sexual violence, sexual harassment and harmful sexual behaviour;
- child sexual exploitation and child criminal exploitation, including county lines, gangs, trafficking and modern slavery;
- domestic abuse, honour-based abuse, forced marriage and female genital mutilation (including the mandatory reporting duty where applicable);

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- radicalisation and extremism under Prevent, including referral to Channel where appropriate;
- online abuse, grooming, coercion, sharing nudes/semi-nudes, upskirting and technology-facilitated abuse;
- mental health concerns where they may indicate abuse, neglect, exploitation or increased vulnerability;
- children missing from education, repeated/prolonged absence, missing from home/care and contextual safeguarding risks;
- substance misuse, homelessness, young carers, private fostering, looked-after/previously looked-after children, SEND/disability and other circumstances that may increase vulnerability.

7.1 Child-on-child sexual behaviour

Children can abuse other children inside or outside the provision and online. The provision has a zero-tolerance approach to sexual violence and sexual harassment. Reports will be taken seriously, recorded, risk assessed and responded to in a child-centred and proportionate way, with support for the victim and appropriate safeguarding action regarding the alleged perpetrator and other affected children.

8. Concerns and allegations about adults working with children

- Concerns about a member of staff, volunteer, contractor or other adult must be reported immediately to the DSL/Director in accordance with the staff code of conduct and allegations procedure. Concerns about the Director must be reported to the appropriate independent/strategic safeguarding person and advice sought from the LADO.
- Allegations that may meet the harm threshold will be referred promptly to the Local Authority Designated Officer (LADO) and police/Children's Social Care where appropriate. Historical allegations and allegations about former staff will also be reported appropriately.
- Low-level concerns will be recorded and managed in line with KCSIE and the provision's staff behaviour/code of conduct arrangements. Patterns will be reviewed.
- Whistleblowing routes will be available where staff feel unable to raise concerns internally. The welfare of the child is paramount.
- Where required, referrals will be made to the Disclosure and Barring Service and/or relevant professional regulator.

9. Safer recruitment, visitors, contractors and premises

- Recruitment and vetting checks will be undertaken in line with KCSIE and applicable law/commissioning requirements, with an appropriate Single Central Record or equivalent audit record maintained.
- Identity, qualifications, employment history, references and DBS/barred-list checks will be completed where required. Recruitment panels will include appropriately trained staff.
- Visitors and contractors will sign in, be identifiable, receive safeguarding information and be supervised where necessary.
- Site security arrangements will reduce unauthorised access and ensure children can learn in a safe environment.
- Where any premises/facilities are hired or rented to other organisations, the provision will have safeguarding arrangements proportionate to the activity, including expectations about child protection, safer recruitment and responding to concerns. This requirement does not apply to online-only delivery where no premises are hired or used.

10. Training and safeguarding culture

- All staff with direct contact with children and young people will successfully complete safeguarding and child protection training at Level 2 or above through an accredited or appropriately recognised provider, with evidence retained.
- All staff will successfully complete Prevent training and understand local referral arrangements.
- New staff will receive safeguarding induction before or at the start of direct work, including the policy, staff code of conduct, reporting routes, DSL details, online safety, attendance and KCSIE Part 1 as applicable.
- Safeguarding training and updates will be refreshed at least annually and whenever changes to KCSIE, Working Together, local procedures, AP standards or relevant law/guidance require changes in practice.
- DSL/DDSL training will be maintained at the appropriate advanced level, with annual knowledge updates and access to supervision/monitoring and CPD.
- Training records, reading confirmations and actions from non-attendance will be retained for compliance checks.

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11. Online safety, technology and attendance

Technology is a significant factor in many safeguarding and wellbeing issues. The provision will maintain appropriate online safety arrangements, staff boundaries, acceptable-use expectations and proportionate filtering/monitoring controls relevant to its systems and delivery model. Staff will report online safeguarding concerns through the same safeguarding process as offline concerns.

Attendance is a safeguarding matter. Unexplained, repeated or prolonged absence and missing education will be followed up promptly, with the commissioning school/local authority informed as required. Where absence creates or indicates safeguarding risk, the DSL will escalate to Children's Social Care/police as appropriate.

12. Support, equality and vulnerable learners

Hair at the Academy recognises that some children face additional barriers to disclosure or increased safeguarding risk, including children with SEND/disabilities, looked-after and previously looked-after children, young carers, children experiencing discrimination, children with mental health needs and those affected by exploitation or instability. Safeguarding responses will be child-centred, trauma-aware, non-discriminatory and consistent with the Equality Act 2010 and Human Rights Act 1998.

Children and staff involved in safeguarding matters will be offered appropriate support. The child's wishes and feelings will be considered, while recognising that safeguarding action may still be required even where a child does not want information shared.

13. Monitoring and review

- This policy will be reviewed at least annually and sooner following significant incidents, changes to legislation/guidance, local safeguarding procedures, commissioning requirements or identified weaknesses.
- The DSL and strategic safeguarding lead will monitor referrals, outcomes, attendance concerns, allegations/low-level concerns, training compliance, safer recruitment, record quality and actions arising from audits or commissioner reviews.
- Policies and practice will be updated annually to reflect relevant KCSIE changes, and staff will receive any necessary training or briefing.

14. Related policies

This policy should be read with the Staff Code of Conduct/Staff Behaviour Policy, Whistleblowing Policy, Safer Recruitment arrangements, Online Safety/Acceptable Use, Attendance, Behaviour/Anti-Bullying, Health and Safety, First Aid/Medical arrangements, Data Protection/Confidentiality, Equality, Complaints and any local safeguarding procedures or commissioning requirements.

Appendix 1. Key contacts and DCFD referral details

This appendix is a quick-reference aid only. The referral duties and follow-up requirements are integrated in sections 3, 4 and 5 of this policy.

- DSL: Mary Pugsley MBE — 07974 750699 — mp.hairattheacademy@gmail.com
- DDSLs: Victoria Fricker — vf.hairattheacademy@gmail.com; Tyler Gray — tg.hairattheacademy@gmail.com
- Community DSL: Rhi Belcher — rb.hairattheacademy@gmail.com
- Prevent SPOC: Mary Pugsley MBE
- Looked-after / previously looked-after young people: Kat Parsley — kparsley.hairattheacademy@gmail.com
- Devon Children's Front Door (urgent safeguarding): 0345 155 1071
- Emergency Duty Service (out of hours): 0345 6000 388
- Immediate danger / emergency: 999
- [Devon Safeguarding Children Partnership – Request for Support](#) — Current professional referral route and local guidance.
- [Devon Safeguarding Children Partnership – further information](#) — Front Door/MASH information and local procedures.

Appendix 2. Legislation and statutory guidance

The following links support this policy. Applicability depends on the legal status of the provision and its commissioning arrangements.

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- [Keeping Children Safe in Education 2026](#)
- [Working Together to Safeguard Children](#)
- [Alternative provision – statutory guidance](#)
- [Non-school alternative provision: voluntary national standards](#)
- [Children Act 1989](#)
- [Children Act 2004](#)
- [Education Act 2002](#)
- [Equality Act 2010](#)
- [Human Rights Act 1998](#)
- [Data Protection Act 2018](#)
- [Information sharing advice for safeguarding practitioners](#)
- [Counter-Terrorism and Security Act 2015](#)
- [Prevent duty guidance](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Sexual Offences Act 2003](#)
- [Female Genital Mutilation Act 2003](#)
- [Modern Slavery Act 2015](#)
- [Domestic Abuse Act 2021](#)
- [Sharing nudes and semi-nudes: advice for education settings](#)

Compliance note: This policy is designed to provide a concise safeguarding framework for Hair at the Academy as an alternative provision provider. It should be reviewed against the organisation's exact legal status, current commissioning contracts and Devon local safeguarding procedures at each annual review and whenever relevant guidance changes.

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